

## UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN JOSE DIVISION

2008 JUN 18 PM 4:40  
RICHARD W. WIEKING  
CLERK  
U.S. DISTRICT COURT  
NO. DIST. OF CA. S.J.

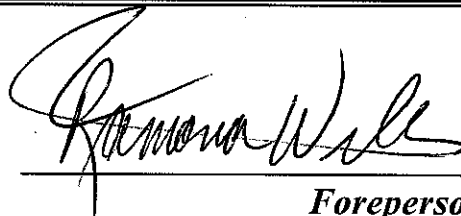
THE UNITED STATES OF AMERICA

vs.

SEE COVER SHEET ATTACHMENT

## INDICTMENT

SEE COVER SHEET ATTACHMENT

*A true bill.**Foreperson*Filed in open court this 18 day of June

A.D. 2008



UNITED STATES MAGISTRATE JUDGE

Bail. \$ No process required.

**ATTACHMENT TO INDICTMENT COVER SHEET**

**UNITED STATES**

**v.**

**TRUC QUOC LE, THUY DANG, LEO LE NGUYEN,  
GLENN LENGSAVATH, TIFFANY VU, THANH LE, TIEN  
LE, JOHANNA RODRIGUEZ, CARMEN SARMIENTO,  
a/k/a Carmen Gutierrez, MANUAL GUTIERREZ, and JUAN  
ESPINOZA, a/k/a Freddy Navarro.**

**COUNT ONE: Title 18, United States Code, Section 371- Conspiracy to Commit Interstate Transportation of Stolen Property**

**DEFENDANTS: TRUC QUOC LE, THUY DANG, LEO LE NGUYEN, GLENN LENGSAVATH, TIFFANY VU, THANH LE, TIEN LE, JOHANNA RODRIGUEZ, CARMEN SARMIENTO, a/k/a Carmen Gutierrez, MANUAL GUTIERREZ, and JUAN ESPINOZA, a/k/a Freddy Navarro.**

**COUNT TWO: Title 18, United States Code, Section 1956(h) – Conspiracy to Commit Money Laundering.**

**DEFENDANTS: TRUC QUOC LE, THUY DANG, LEO LE NGUYEN, GLENN LENGSAVATH, and TIFFANY VU.**

**COUNTS THREE THROUGH EIGHT: Title 18, United States Code, Section 1957 - Monetary Transactions Using Criminally Derived Property.**

**DEFENDANTS: THUY DANG, TIFFANY VU and GLENN LENGSAVATH.**

**COUNT NINE THOUGH THIRTY-ONE: Title 31, United States Code, Section 5324(a)(3) – Structuring.**

**DEFENDANTS: TRUC QUOC LE, THUY DANG, LEO LE NGUYEN, GLENN LENGSAVATH, and TIFFANY VU.**

**COUNTS THIRTY-TWO THROUGH THIRTY-FOUR: Title 18, United States Code, Section 2314- Interstate Transportation of Stolen Property.**

**DEFENDANTS: TRUC QUOC LE, THUY DANG, LEO LE NGUYEN, and TIEN LE.**

**COUNTS THIRTY-FIVE THROUGH THIRTY-SEVEN:** Title 18, United States Code, Section 2314- Interstate Transportation of Stolen Property.

**DEFENDANTS:** TRUC QUOC LE, THUY DANG, GLENN LENGSAVATH, TIFFANY VU, THANH LE, and TIEN LE.

**FORFEITURE ALLEGATION:** Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code 2461(c) – Forfeiture of Proceeds of Specified Unlawful Activity.

**DEFENDANTS:** TRUC QUOC LE, THUY DANG, GLENN LENGSAVATH, and TIFFANY VU.

**SECOND FORFEITURE ALLEGATION :** Title 18, United States Code, Section 982(a)(1) - Money Laundering Forfeiture.

**DEFENDANTS:** TRUC QUOC LE, THUY DANG, GLENN LENGSAVATH, and TIFFANY VU.

**THIRD FORFEITURE ALLEGATION :** Title 31, United States Code, Section 5317 (c) – Structuring Forfeiture.

**DEFENDANTS:** TRUC QUOC LE, THUY DANG, GLENN LENGSAVATH, and TIFFANY VU.

JOSEPH P. RUSSONIELLO (CASBN 44332)  
United States Attorney

FILED

2008 JUN 18 P 1:34

RICHARD W. WIEKING  
CLERK  
U.S. DISTRICT COURT  
NO. DIST. OF CA. S.J.

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

JF  
HRL

UNITED STATES OF AMERICA,

Plaintiff,

v.

TRUC QUOC LE,  
THUY DANG,  
LEO LE NGUYEN,  
GLENN LENGSAVATH,  
TIFFANY VU,  
THANH LE,  
TIEN LE,  
JOHANNA RODRIGUEZ,  
CARMEN SARMIENTO,  
a/k/a Carmen Gutierrez,  
MANUAL GUTIERREZ, and  
JUAN ESPINOZA,  
a/k/a Freddy Navarro,

Defendants.

**CR-08 00401**  
No.

VIOLATIONS:

Title 18 U.S.C § 371 – Conspiracy to  
Commit Interstate Transportation of Stolen  
Property; 18 U.S.C. § 1956(h) – Conspiracy  
to Commit Money Laundering; 18 U.S.C. §  
1957 – Engaging in Monetary Transactions  
Using Criminally Derived Property;  
18 U.S.C. § 2314 – Interstate Transportation  
of Stolen Property; 31 U.S.C. § 5324(a) –  
Structuring Financial Transactions;  
18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. §  
2461(c) - Forfeiture of Criminally Derived  
Proceeds; 18 U.S.C. § 982(a)(1) – Money  
Laundering Forfeiture

SAN JOSE VENUE

INDICTMENT

The Grand Jury charges that:

**COUNT ONE:** (18 U.S.C. § 371 – Conspiracy to Commit Interstate Transportation of  
Stolen Property)

1. Beginning no later than in or about December 2005, and continuing until June 4,  
2008, within the Northern District of California and elsewhere, the defendants,

INDICTMENT

1 TRUC QUOC LE,  
2 THUY DANG,  
3 LEO LE NGUYEN,  
4 GLENN LENGSAVATH,  
5 TIFFANY VU,  
6 THANH LE,  
7 TIEN LE,  
8 JOHANNA RODRIGUEZ,  
9 CARMEN SARMIENTO,  
10 a/k/a Carmen Gutierrez,  
11 MANUAL GUTIERREZ, and  
12 JUAN ESPINOZA,  
13 a/k/a Freddy Navarro,

14 did knowingly conspire with each other, and with other persons both known and unknown to the  
15 grand jury, to commit an offense against the United States, to wit: a violation of 18 U.S.C. §  
16 2314, in that the defendants, and each of them, did agree to transport in interstate commerce  
17 merchandise of a value of \$5,000 and more, knowing the same to have been stolen, converted,  
18 and taken by fraud.

19 MANNER AND MEANS

20 2. The defendants conspired to acquire and distribute over-the-counter health and  
21 beauty (OTC/HB) products, which they knew to have been stolen from major chains including  
22 Safeway, Target, Walgreens, Walmart, Longs Drugs, Raleys/Nob Hill, Save Mart, and other  
23 stores, and then to sell those products in interstate commerce. The OTC/HB products, including  
24 such items as analgesics and cough and cold medications, razor blades, camera film, batteries,  
25 beauty products, infant formula, and oral care products, were stolen by organized crews of  
26 professional shoplifters, also known as "boosters." The boosters would and did sell their stolen  
27 merchandise to intermediaries, known as "fences," who would in turn sell the product to  
28 wholesale distributors located outside of California. The distributors completed the circle by  
selling the stolen merchandise back to retailers. As part of the conspiracy, the boosters, fences,  
and wholesale distributors would "clean" the stolen property by removing any identifying price  
labels, store security tags, and other distinguishing markings, so that the ultimate (re)purchasers  
would not know that they were buying stolen products.

//

ROLES OF THE CONSPIRATORS

3. The role of each defendant in the conspiracy is generally described as follows:

a. Truc Quoc Le ("Truc Le") was the leader of the criminal organization. He purchased stolen merchandise from boosters and oversaw the distribution of the products. He sold some of the stolen merchandise himself, or through subordinates, at local flea markets. The rest he caused to be distributed to wholesalers in other states, including Utah and Florida. Truc Le also directed subordinates and associates to engage in complex financial transactions designed to conceal the nature, source, ownership and control of the funds he received from the sales of stolen property. Those funds were also used to pay boosters for additional stolen product, thereby promoting the continued operation of the illegal enterprise.

b. Thuy Dang ("Dang"), who was married to Truc Le, engaged in complex financial transactions designed to conceal the nature, source, ownership and control of the funds the organization received from the sales of stolen property, and funneled those funds back to Truc Le to be used to carry on the illegal enterprise.

c. Leo Le Nguyen ("Nguyen") was, between no later than December 2005 through approximately April 2007, an assistant to Truc Le. Nguyen was directly responsible for shipping stolen merchandise to distributors outside of California. He also received payments from distributors and funneled the proceeds to other members of the conspiracy.

d. Glenn Lengsavath ("Lengsavath") was an assistant to Truc Le. Lengsavath was directly responsible for shipping stolen merchandise to distributors outside of California. He also received payments from distributors and funneled the proceeds to other members of the conspiracy. Lengsavath also sometimes received stolen merchandise directly from boosters.

e. Tiffany Vu ("Vu"), who was married to Lengsavath, engaged in complex financial transactions designed to conceal the nature, source, ownership and control of the funds the organization received from the sales of stolen property, and funneled those funds back to Truc Le to be used to carry on the illegal enterprise.

f. Thanh Le was a subordinate of Truc Le. He cleaned stolen property to

1 prepare it for resale. He also sometimes received stolen property from boosters, and assisted  
2 Lengsavath in preparing and shipping stolen merchandise out of state to distributors outside of  
3 California.

4 g. Tien Le was a subordinate of Truc Le. He received stolen property from  
5 boosters, usually accompanying Truc Le, but sometimes did so on his own.

6 h. Johanna Rodriguez delivered and sold stolen merchandise to the Truc Le  
7 organization.

8 i. Carmen Sarmiento, a/k/a Carmen Gutierrez ("Sarmiento"), delivered and  
9 sold stolen merchandise to the Truc Le organization.

10 j. Manuel Gutierrez ("Gutierrez") delivered stolen merchandise to the Truc  
11 Le organization.

12 k. Juan Espinoza, a/k/a Freddy Navarro ("Espinoza"), delivered stolen  
13 merchandise to the Truc Le organization.

14 OVERT ACTS IN FURTHERANCE OF THE CONSPIRACY

15 4. During the course of the conspiracy, and in order to accomplish its objectives, the  
16 defendants and other unindicted co-conspirators knowingly committed the following overt acts,  
17 among others, in the Northern District of California, and elsewhere:

18 a. On January 6, 2006, Truc Le and an unindicted coconspirator identified as  
19 L.L. loaded boxes into a truck.

20 b. Also on January 6, 2006, Truc Le and L.L. possessed two garbage bags  
21 filled with removable toothbrush heads (Oral B, Sonic-Care, etc.). One of those items, a sealed  
22 package of Oral B toothbrush heads, bore a marking showing that it had come from a Safeway  
23 store in Burlingame, California.

24 c. On January 17, 2006, Truc Le and Tien Le, along with two unknown  
25 coconspirators, transferred approximately 30-40 boxes from a U-Haul truck into a van driven by  
26 Tien Le.

27 d. Also on January 17, 2006, following the transaction described in the  
28 previous subparagraph, Sarmiento possessed \$77,000 in United States currency.

1 e. On January 19, 2006, Truc Le met two unknown persons, one male and  
2 one female, who arrived in a van registered to Johanna Rodriguez. Le gave the female something  
3 in return for two full garbage bags.

4 f. On January 20, 2006, Truc Le met with several unknown persons and  
5 received large, full garbage bags from them.

6 g. On October 19, 2006, Truc Le purchased purportedly stolen merchandise  
7 from an undercover San Jose Police Department officer. Le paid \$70 for merchandise with an  
8 approximate retail value of \$232.

9 h. On October 24, 2006, Truc Le purchased purportedly stolen merchandise  
10 from an undercover San Jose Police Department officer. Le paid \$770 for merchandise with an  
11 approximate retail value of \$2,727.

12 i. On April 18, 2008, Lengsavath and Thanh Le drove to Los Angeles and  
13 picked up approximately 36 boxes and six full plastic garbage bags containing OTC/HB  
14 merchandise from Johanna Rodriguez.

15 j. On May 20, 2008, Thanh Le and another person drove to a storage facility  
16 in Glendale, California, where they met with Sarmiento, Gutierrez, and Espinoza.

17 k. Also on May 20, 2008, shortly after the meeting described in the previous  
18 paragraph, Sarmiento possessed \$107,901 in United States currency.

19 l. On March 14, 2007, Leo Nguyen shipped three pallets, containing a total  
20 of thirty-two boxes, each filled with Oil of Olay products, to a freight forwarder in Burlingame,  
21 California.

22 m. On April 11, 2008, Lengsavath and Thanh Le delivered ninety-four  
23 cardboard boxes containing, according to the shipping labels, "over the counter supplies" to a  
24 freight forwarder in South San Francisco for shipment to Florida; and

25 n. On May 8, 2008, Lengsavath delivered approximately thirty boxes to a  
26 shipping company in San Lorenzo, California, for shipment to Utah.

27 All in violation of Title 18, United States Code, Sections 371 and 2314.  
28



**COUNT TWO:** (18 U.S.C. § 1956(h) – Conspiracy to Commit Money Laundering)

5. The factual allegations contained in paragraphs 2 through 4 of Count One, the transactions alleged in Counts Three through Eight, and the transactions alleged in Counts Nine through Thirty-One of this Indictment, are re-alleged and incorporated as if fully set forth here.

6. Beginning no later than on or about January 1, 2005, and continuing at least until May 14, 2008, within the Northern District of California and elsewhere, the defendants,

TRUC QUOC LE,  
THUY DANG,  
LEO LE NGUYEN,  
GLENN LENGSAVATH, and  
TIFFANY VU,

did knowingly conspire with each other, and with other persons both known and unknown to the grand jury, to commit offenses against the United States in violation of Title 18, United States Code, Sections 1956 and 1957, to wit:

a. knowing that property involved in a financial transaction represented the proceeds of some form of unlawful activity, and which property was in fact the proceeds of specified unlawful activity, *i.e.*, interstate transportation of stolen property, defendants conducted financial transactions with the intent to promote the carrying on of that specified unlawful activity, in violation of 18 U.S.C. § 1956(a)(1)(A)(i); and

b. knowing that property involved in a financial transaction represented the proceeds of some form of unlawful activity, and which property was in fact the proceeds of specified unlawful activity, *i.e.*, interstate transportation of stolen property, defendants conducted financial transactions knowing that those transactions were designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of that specified unlawful activity, in violation of 18 U.S.C. § 1956(a)(1)(B)(i); and

c. knowing that property involved in a financial transaction represented the proceeds of some form of unlawful activity, and which property was in fact the proceeds of specified unlawful activity, *i.e.*, interstate transportation of stolen property, defendants conducted financial transactions knowing that those transactions were designed in whole and in part to avoid a transaction reporting requirement under Federal law, in violation of 18 U.S.C. §

1 1956(a)(1)(B)(ii).

2 d. defendants knowingly engaged in monetary transactions by, through, and  
3 to a financial institution, affecting interstate commerce, in criminally derived property of a value  
4 greater than \$10,000, said property having in fact been derived from specified unlawful activity,  
5 *i.e.*, interstate transportation of stolen property, in violation of Title 18, United States Code,  
6 Section 1957.

7 MANNER AND MEANS

8 7. The objectives, manner, and means of the conspirators in carrying out the money  
9 laundering conspiracy included the following:

10 a. Using multiple bank accounts, in a process known as "layering," to  
11 transfer and withdraw funds in order to evade detection by law enforcement.

12 b. Structuring currency deposits and withdrawals in amounts under the  
13 \$10,000 federal currency reporting threshold in order to prevent financial institutions from filing  
14 Currency Transaction Reports ("CTRs") as required by law, and thereby to avoid detection by the  
15 Internal Revenue Service and other law enforcement authorities.

16 c. Receiving wire transfer deposits of the proceeds of the illegal enterprise  
17 into bank accounts held by nominees, including family members and other associates, in order to  
18 conceal the source, location, ownership, and control of those funds.

19 d. Purchasing assets in the names of family members who had legitimate  
20 sources of income in order to evade detection of these proceeds and assets.

21 8. In order to accomplish the objectives of the conspiracy, the defendants engaged in  
22 the following financial transactions, among others (all accounts identified by the last four digits  
23 of the account number):

24 //

25 //

26 //

27 //

28 //

<u>Date</u>	<u>From</u>	<u>To</u>	<u>Amount</u>	<u>Description of Transaction</u>
2/22/2006	Farnes Enterprises	Bank of America # 4426 (Leo Nguyen)	\$80,634	Wire transfer from a distributor.
2/22/2006	Leo Nguyen	Leo Nguyen	\$9,800	Cash withdrawal by Nguyen
2/22/2006	Leo Nguyen	Truc Le P.N. Y.F. M.T. P.L.	\$9,700 \$9,800 \$9,700 \$9,700 \$9,500	Checks from Nguyen to various persons, including Truc Le, in amounts less than \$10,000
3/29/2006	Farnes Enterprises	Bank of America #4426 (Leo Nguyen)	\$100,000	Wire transfer from a distributor
3/29/2006	Leo Nguyen	various	\$10,000 \$9,273 \$9,424	Cash withdrawal by Nguyen; checks to M.T. and Thuy Dang
3/30/2006	Leo Nguyen	various	\$9,800 \$9,561 \$9,812 \$9,563 \$9,231	Cash withdrawal by Nguyen (\$9,800); check to P.N. (\$9,561), two checks to Thuy Dang (\$9,812 and \$9,563), and check to M.T. (\$9,231)
9/11/2007	Coolrelic (Florida)	WAMU #7700 (Lengsavath)	\$113,305	Wire transfer from a distributor to Lengsavath/TG Distribution
9/12/2007	WAMU #7700 (Lengsavath)	Bank of America #1410 (Tiffany Vu)	\$20,000	Wire transfer from Lengsavath/TG Distribution to Tiffany Vu
9/12/2007	WAMU #7700 (Lengsavath)	Bank of America #1384 (Lengsavath)	\$20,000	Wire transfer from one Lengsavath account to another
9/12/2007	Bank of America #1384 (Lengsavath)	Lengsavath (cash)	\$9,900	Cash withdrawal by Lengsavath
9/14/2007	Bank of America #1384 (Lengsavath)	Lengsavath (cash)	\$4,800	Cash withdrawal by Lengsavath
9/17/2007	Bank of America #1384 (Lengsavath)	Lengsavath (cash)	\$4,900	Cash withdrawal by Lengsavath
12/5/2007	Coolrelic (Florida)	WAMU #7700 (Lengsavath)	\$80,000	Wire transfer from distributor to Lengsavath/TG Distribution

1	12/6/2007	WAMU #7700 (Lengsavath)	Bank of America #1410 (Tiffany Vu)	\$25,000	Wire from Lengsavath to Tiffany Vu
2					
3	12/6/2007	WAMU #7700 (Lengsavath)	Bank of America #1384 (Lengsavath)	\$25,000	Transfer from one Lengsavath account to another
4					
5	12/6/2007	Bank of America #1410 (Tiffany Vu)	Tiffany Vu (cash)	\$9,900	Cash withdrawal by Tiffany Vu
6					
7	12/7/2007	Bank of America #1410 (Tiffany Vu)	Tiffany Vu (cash)	\$9,900	Cash withdrawal by Tiffany Vu
8					
9	3/28/2007	Medsorce (Utah)	WAMU #1595 (Dang, Vu, Lengsavath)	\$74,095	Wire transfer from distributor to account co-owned by Thuy Dang, Tiffany Vu, and Glenn Lengsavath
10					
11	3/28/2007	Coolrelic (Florida)	WAMU #1595 (Dang, Vu Lengsavath)	\$40,000	Wire transfer from distributor to Dang/Vu/Lengsavath account
12					
13	3/29/2007	WAMU #1595 (Dang, Vu Lengsavath)	WAMU #3686 (Thuy Dang)	\$6,000	Wire transfer from one account co-owned by Thuy Dang to another account she co-owned with her brother and sister-in- law
14					
15					
16	3/29/2007	WAMU #1595 (Dang, Vu Lengsavath)	WAMU #3686 (Thuy Dang)	\$5,000	same as above
17					
18	3/29//2007	WAMU #1595 (Dang, Vu Lengsavath)	WAMU #3960 (Tiffany Vu)	\$10,000	Transfer from Dang/Vu/Lengsavath account to account in Vu's name only
19					
20	3/29/2007	WAMU #1595 (Dang, Vu Lengsavath)	Tiffany Vu (cash)	\$5,000	Cash withdrawal by Tiffany Vu
21					
22	3/29/2007	WAMU #3960 (Tiffany Vu)	Tiffany Vu (cash)	\$5,000	Cash withdrawal by Tiffany Vu
23					
24	3/29/2007	WAMU #3960 (Tiffany Vu)	Tiffany Vu (cash)	\$4,900	Cash withdrawal by Tiffany Vu
25					
26	3/12/2007	Medsorce (Utah)	WAMU #1595 (Dang, Vu Lengsavath)	\$51,727	Wire transfer from distributor to Dang/Vu/Lengsavath account
27					
28	3/12/2007	WAMU #1595 (Dang, Vu Lengsavath)	WAMU #3686 (Thuy Dang)	\$10,072 \$11,600	Two wires from one Thuy Dang account to another

All in violation of Title 18, United States Code, Section 1956(h).

**COUNTS THREE THROUGH EIGHT:**

(18 U.S.C. § 1957 – Monetary Transactions  
Using Criminally Derived Property)

9. The factual allegations contained in paragraphs 2 through 4 of Count One of this Indictment are re-alleged and incorporated as if fully set forth here.

10. On or about the dates listed below, in the Northern District of California, the defendants, as named in each of Counts Three through Eight, did knowingly engage in a monetary transaction by, through, or to a financial institution, affecting interstate commerce, in criminally derived property of a value greater than \$10,000, said property having in fact been derived from specified unlawful activity, *i.e.*, interstate transportation of stolen property:

<u>Count</u>	<u>Date</u>	<u>Defendant</u>	<u>Transaction</u>
3	4/26/2006	Thuy Dang	\$25,000 check to Mercedes Benz of San Diego
4	4/10/2007	Thuy Dang	\$12,069 check to Tax Collector of Santa Clara County (property tax payment)
5	7/10/2007	Thuy Dang	\$10,077 check to Countrywide
6	10/01/2007	Thuy Dang	\$10,582 check to Countrywide
7	2/21/2008	Tiffany Vu	\$15,000 check to Lexus of Cerritos
8	8/30/2007	Glenn Lengsavath	\$20,000 check to Hartzheim Dodge

All in violation of Title 18, United States Code, Sections 1957 and 2.

**COUNT NINE THOUGH THIRTY-ONE:**

(31 U.S.C. § 5324(a)(3) – Structuring)

11. The factual allegations contained in paragraphs 2 through 4 of Count One of this Indictment are re-alleged and incorporated as if fully set forth here.

12. On or about the dates set forth below, in the Northern District of California, the defendants, as named in each of Counts Nine through Thirty-Two, knowingly and for the purpose of evading the reporting requirements of section 5313(a) of Title 31, United States Code, and the regulations promulgated thereunder, did structure, and assist in structuring, the following

transactions with domestic financial institutions, and did so while violating another law of the United States and as part of a pattern of illegal activity involving more than \$100,000 in a 12-month period:

<u>Count</u>	<u>Date</u>	<u>Defendant</u>	<u>Description of Transaction</u>
9	3/01/2006	Leo Nguyen	Cash withdrawal of \$9,800
10	3/02/2006	Leo Nguyen	Cash withdrawal of \$9,500
11	3/08/2007	Glenn Lengsavath	Cash withdrawal of \$5,000
12	3/09/2007	Glenn Lengsavath	Cash withdrawal of \$5,000
13	3/12/2007	Glenn Lengsavath	Cash withdrawal of \$5,000
14	3/14/2007	Glenn Lengsavath	Cash withdrawal of \$5,000
15	6/26/2007	Glenn Lengsavath	Cash withdrawal of \$9,900
16	6/27/2007	Glenn Lengsavath	Cash withdrawal of \$9,900
17	12/06/2007	Tiffany Vu	Cash withdrawal of \$9,900
18	12/07/2007	Tiffany Vu	Cash withdrawal of \$9,900
19	12/20/2006	Tiffany Vu	Cash withdrawal of \$5,000
20	12/21/2006	Tiffany Vu	Cash withdrawal of \$5,000
21	1/23/2007	Tiffany Vu	Cash withdrawal of \$5,000
22	1/24/2007	Tiffany Vu	Cash withdrawal of \$5,000
23	3/12/2007	Thuy Dang	Cash withdrawal of \$5,000
24	3/13/2007	Thuy Dang	Cash withdrawal of \$4,300
25	3/13/2007	Thuy Dang	Cash withdrawal of \$5,000
26	1/17/2006	Truc Le	Cash withdrawal of \$5,000
27	1/17/2006	Truc Le	Cash withdrawal of \$5,000
28	1/18/2006	Truc Le	Cash withdrawal of \$5,000
29	1/19/2006	Truc Le	Cash withdrawal of \$5,000
30	1/10/2006	Truc Le	Cash withdrawal of \$5,000
31	1/11/2006	Truc Le	Cash withdrawal of \$5,000

All in violation of Title 31, United States Code, Section 5324(a)(3); Title 31, Code of Federal Regulations, Section 103.11; and Title 18, United States Code, Section 2.

**COUNTS THIRTY-TWO THROUGH THIRTY-FOUR:**

(18 U.S.C. § 2314 – Interstate Transportation of Stolen Property)

13. The factual allegations contained in paragraphs 2 through 4 of Count One of this Indictment are re-alleged and incorporated as if fully set forth here. The grand jury further alleges that each “pallet” referred to in the counts that follow had a value in excess of \$5,000.

14. On or about the dates set forth below, in the Northern District of California, the defendants,

TRUC QUOC LE,  
THUY DANG,  
LEO LE NGUYEN, and  
TIEN LE,

did transport in interstate commerce merchandise of a value of \$5,000 and more, knowing the same to have been stolen, converted, and taken by fraud:

<u>Count</u>	<u>Date</u>	<u>Shipped From</u>	<u>Shipped To</u>	<u>Description</u>
32	2/03/2006	3812 Rouen Court, San Jose	Medsource, Woods Cross, Utah	Four pallets shipped by Leo Nguyen from his home address
33	4/07/2006	3812 Rouen Court, San Jose	Medsource, Woods Cross, Utah	Six pallets shipped by Leo Nguyen from his home address
34	3/15/2007	3812 Rouen Court, San Jose	Medsource, Woods Cross, Utah	Three pallets shipped by Leo Nguyen from his home address

All in violation of Title 18, United States Code, Sections 2314 and 2.

**COUNTS THIRTY-FIVE THROUGH THIRTY-SEVEN:**

(18 U.S.C. § 2314 – Interstate Transportation of Stolen Property)

15. The factual allegations contained in paragraphs 2 through 4 of Count One of this Indictment are re-alleged and incorporated as if fully set forth here. The grand jury also alleges that each “pallet” referred to in the counts that follow had a value in excess of \$5,000.

16. On or about the dates set forth below, in the Northern District of California, the



defendants,

TRUC QUOC LE,  
THUY DANG,  
GLENN LENGSAVATH,  
TIFFANY VU,  
THANH LE, and  
TIEN LE,

did transport in interstate commerce merchandise of a value of \$5,000 and more, knowing the same to have been stolen, converted, and taken by fraud:

<u>Count</u>	<u>Date</u>	<u>Shipped From</u>	<u>Shipped To</u>	<u>Description</u>
35	4/11/2008	South San Francisco, CA	Coolrelic, Miami, FL	Six pallets containing "over the counter supplies"
36	4/21/2008	South San Francisco, CA	Coolrelic, Miami, FL	Four pallets containing "over the counter supplies"
37	5/08/2008	San Lorenzo, CA	GCE, Utah	One pallet (30 boxes)

All in violation of Title 18, United States Code, Sections 2314 and 2.

FORFEITURE ALLEGATION: (18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c) – Forfeiture of Proceeds of Specified Unlawful Activity)

17. The factual allegations contained in Counts 1 and 32-37 of this Indictment are re-alleged and by this reference fully incorporated here for the purpose of alleging forfeiture pursuant to the provisions of 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. 2461(c).

18. Upon a conviction of any of the offenses alleged in Count 1, or Counts 32 through 37, the defendants,

TRUC QUOC LE,  
THUY DANG,  
GLENN LENGSAVATH, and  
TIFFANY VU,

shall forfeit to the United States all property, constituting and derived from proceeds traceable to said offenses, including but not limited to the following property:

//



1 (a) **Money Judgment:** a sum of money equal to \$14,257,302, representing the gross  
2 proceeds obtained as a result of the offense.

3 (b) **Real Property:** Real property and improvements located at 40303 Blacow Road,  
4 Fremont, California, further identified with Alameda County APN 525-0969-011-01.

5 (c) **Five Vehicles:**

- 6 1. A 2006 Mercedes ML500, California License Plate Number 5NRP232,  
7 Vehicle Identification Number (VIN) 4JGBB75E06A023213, registered to  
Truc Quoc Le.
- 8 2. A 2007 Mercedes-Benz SL 550 Roadster, California License Plate  
9 Number 5TYG655, VIN WDBSK71F07F119364, registered to Doug  
Dang and Thuy Dang.
- 10 3. A 2007 Dodge Sprinter Van, California License Plate Number 8M44351,  
11 VIN WDOPE845375200153, registered to Glenn Lengsavath.
- 12 4. A 2004 Mercedes Benz SL 500 Roadster, California License Plate Number  
13 5HRU143, VIN WDBSK75F24F081481, registered to Ha V. Vu (Tiffany  
Ha Vu).
- 14 5. A 2000 Mercedes Benz CLK 430 Convertible, California License Plate  
15 Number 4LNX235, VIN WDBLK70G5YT033789, registered to Thuy  
Dang.

16 (d) **Currency:**

- 17 1. \$107,901 taken from Carmen Sarmiento in Glendale, California, May 20,  
2008.
- 18 2. \$10,055 taken from Johanna Rodriguez in Los Angeles on June 4, 2008.
- 19 3. \$38,733, the total amount seized during the execution of search warrants at  
20 2166 Wood Hollow Court in San Jose on June 4, 2008.

21 (e) **Jewelry:** Precious gemstones, precious metals, and jewelry seized on June 4,  
22 2008 from 2166 Wood Hollow Court, San Jose, including the following items:

- 23 1. 9 diamonds.
- 24 2. 12 gold bars.
- 25 3. 10 watches.
- 26 4. 7 rings with gemstones.
- 27 5. Assorted earrings, necklaces, and pendants.

28 //

- (f) **Bank Accounts:** All United States currency funds or other monetary instruments from the following accounts seized by the United States on or about June 4, 2008, or credited to those accounts during the three-day period covered by the Seizure Warrant dated June 2, 2008:

Bank Name	Amount	Bank Account #	Name on Account
Washington Mutual	\$20,831	# 308-145368-6	Doug Dang, Thuy Dang, Dinah Dang
Wells Fargo Bank	\$4,644	# 100-1296027	Truc Le and Thuy Dang
Washington Mutual	\$11,918.93	# 315-425159-5	Glenn Lengsavath, Tiffany Ha Vu, Thuy Dang
Washington Mutual	\$66	# 306-209770-0	Glenn Lengsavath, dba TG Distribution
	\$36,723	# 316-072522-9	Glenn Lengsavath, dba TG Distribution
Washington Mutual	\$831	# 315-121396-0	Tiffany Ha Vu
Bank of America	\$102	# 18183-03528	Tiffany Ha Vu
	\$ 713	# 18186-01410	Tiffany Ha Vu
Bank of America	\$5,572	# 18809-01142	Glenn Lengsavath
	\$ 102	# 23552-11384	Glenn Lengsavath

19. If any of said property, as a result of any act or omission of the defendants –

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to or deposited with, a third person;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be subdivided without difficulty;

any and all interest defendants have in other property shall be vested in the United States and forfeited to the United States pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c) and Rule 32.2 of the Federal Rules of Criminal Procedure.

**SECOND FORFEITURE ALLEGATION:** (18 U.S.C. § 982(a)(1) – Money Laundering Forfeiture)

20. The factual allegations contained in paragraphs 2-4, 7, 8, 10, and in Counts 2 through 8 of this Indictment are hereby realleged and by this reference fully incorporated here for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 982(a)(1).

21. Upon a conviction of any of the offenses alleged in Counts 2 through 8, the defendants

TRUC QUOC LE,  
THUY DANG,  
GLENN LENGSAVATH, and  
TIFFANY VU,

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(1), all right, title and interest in property, real and personal, involved in said violations, or any property traceable to such property, including but not limited to the following:

(a) **Money Judgment:** a sum of money equal to \$14,257,302, representing the amount of gross proceeds obtained as a result of the offense.

(b) **Real Property:** Real property and improvements located at 40303 Blacow Road, Fremont, California, further identified with Alameda County APN 525-0969-011-01.

(c) **Vehicles:**

1. A 2006 Mercedes ML500, California License Plate Number 5NRP232, Vehicle Identification Number (VIN) 4JGBB75E06A023213, registered to Truc Quoc Le.
2. A 2007 Mercedes-Benz SL 550 Roadster, California License Plate Number 5TYG655, VIN WDBSK71F07F119364, registered to Doug Dang and Thuy Dang.
3. A 2007 Dodge Sprinter Van, California License Plate Number 8M44351, VIN WDOPE845375200153, registered to Glenn Lengsavath.
4. A 2004 Mercedes Benz SL 500 Roadster, California License Plate Number 5HRU143, VIN WDBSK75F24F081481, registered to Ha V. Vu (Tiffany Ha Vu).
5. A 2000 Mercedes Benz CLK 430 Convertible, California License Plate Number 4LNX235, VIN WDBLK70G5YT033789, registered to Thuy Dang.

(d) **Currency:**

1. \$107,901 taken from Carmen Sarmiento in Glendale, California, May 20, 2008.
2. \$10,055 taken from Johanna Rodriguez in Los Angeles on June 4, 2008.
3. \$38,733, the total amount seized during the execution of search warrants 2166 Wood Hollow Court in San Jose on June 4, 2008.

(e) **Jewelry:** Precious gemstones, precious metals, and jewelry seized on June 4, 2008 from 2166 Wood Hollow Court, San Jose, including the following items:

1. 9 diamonds.
2. 12 gold bars.
3. 10 watches.
4. 7 rings with gemstones.
5. Assorted earrings, necklaces, and pendants.

(f) **Bank Accounts:** All United States currency funds or other monetary instruments from the following accounts seized by the United States on or about June 4, 2008, or credited to those accounts during the three-day period covered by the Seizure Warrant dated June 2, 2008:

Bank Name	Amount	Bank Account #	Name on Account
Washington Mutual	\$ 20,831	# 308-145368-6	Doug Dang, Thuy Dang, Dinah Dang
Wells Fargo Bank	\$ 4,644	# 100-1296027	Truc Le and Thuy Dang
Washington Mutual	\$11,918.93	# 315-425159-5	Glenn Lengsavath, Tiffany Ha Vu, Thuy Dang
Washington Mutual	\$ 66	# 306-209770-0	Glenn Lengsavath, dba TG Distribution
	\$36,723	# 316-072522-9	Glenn Lengsavath, dba TG Distribution
Washington Mutual	\$ 831	# 315-121396-0	Tiffany Ha Vu
Bank of America	\$102	# 18183-03528	Tiffany Ha Vu
	\$713	# 18186-01410	Tiffany Ha Vu
Bank of America	\$5,572	# 18809-01142	Glenn Lengsavath
	\$102	# 23552-11384	Glenn Lengsavath

22. If any of said property, as a result of any act or omission of the defendants --

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to or deposited with, a third person;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) as been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

any and all interest defendants have in any other property, up to value of the property described in paragraph 2 above, shall be forfeited to the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1), and Rule 32.2 of the Federal Rules of Criminal Procedure.

**THIRD FORFEITURE ALLEGATION :** (31 U.S.C. § 5317 (c) – Structuring Forfeiture)

23. The factual allegations contained in paragraphs 2-4, 6, 7, 8, 10, 12, and in Counts 9 through 31 of this Indictment are hereby realleged and by this reference fully incorporated here for the purpose of alleging forfeiture pursuant to pursuant to Title 31, United States Code, Section 5317(c).

24. Upon a conviction of any of the offenses alleged in Counts 9 through 31, the defendants,

TRUC QUOC LE,  
THUY DANG,  
GLENN LENGSAVATH, and  
TIFFANY VU,

shall forfeit to the United States, pursuant to Title 31, United States Code, Section 5317(c), all right, title and interest in property, real and personal, involved in said violation, or any property traceable to such property, including but not limited to the following:

(a) **Money Judgment:** a sum of money equal to \$14,257,302, representing the amount of gross proceeds obtained as a result of the offense.

(b) **Real Property:** Real property and improvements located at 40303 Blacow Road, Fremont, California, further identified with Alameda County APN 525-0969-011-01.

(c) **Vehicles:**

1. A 2006 Mercedes ML500, California License Plate Number 5NRP232, Vehicle Identification Number (VIN) 4JGBB75E06A023213, registered to Truc Quoc Le.
2. A 2007 Mercedes-Benz SL 550 Roadster, California License Plate Number 5TYG655, VIN WDBSK71F07F119364, registered to Doug Dang and Thuy Dang.
3. A 2007 Dodge Sprinter Van, California License Plate Number 8M44351, VIN WDOPE845375200153, registered to Glenn Lengsavath.
4. A 2004 Mercedes Benz SL 500 Roadster, California License Plate Number 5HRU143, VIN WDBSK75F24F081481, registered to Ha V. Vu (Tiffany Ha Vu).
5. A 2000 Mercedes Benz CLK 430 Convertible, California License Plate Number 4LNX235, VIN WDBLK70G5YT033789, registered to Thuy Dang.

(d) **Currency:**

1. \$107,901 taken from Carmen Sarmiento in Glendale, California, May 20, 2008.
2. \$10,055 taken from Johanna Rodriguez in Los Angeles on June 4, 2008.
3. \$38,733, the total amount seized during the execution of search warrants 2166 Wood Hollow Court in San Jose on June 4, 2008.

(e) **Jewelry:** Precious gemstones, precious metals, and jewelry seized on June 4, 2008 from 2166 Wood Hollow Court, San Jose, including the following items:

1. 9 diamonds.
2. 12 gold bars.
3. 10 watches.
4. 7 rings with gemstones.
5. Assorted earrings, necklaces, and pendants.

(f) **Bank Accounts:** All United States currency funds or other monetary instruments from the following accounts seized by the United States on or about June 4, 2008,

or credited to those accounts during the three-day period covered by the Seizure  
Warrant dated June 2, 2008:

Bank Name	Amount	Bank Account #	Name on Account
Washington Mutual	\$ 20,831	# 308-145368-6	Doug Dang, Thuy Dang, Dinah Dang
Wells Fargo Bank	\$ 4,644	# 100-1296027	Truc Le and Thuy Dang
Washington Mutual	\$11,918.93	# 315-425159-5	Glenn Lengsavath, Tiffany Ha Vu, Thuy Dang
Washington Mutual	\$ 66	# 306-209770-0	Glenn Lengsavath, dba TG Distribution
	\$36,723	# 316-072522-9	Glenn Lengsavath, dba TG Distribution
Washington Mutual	\$ 831	# 315-121396-0	Tiffany Ha Vu
Bank of America	\$102	# 18183-03528	Tiffany Ha Vu
	\$713	# 18186-01410	Tiffany Ha Vu
Bank of America	\$5,572	# 18809-01142	Glenn Lengsavath
	\$102	# 23552-11384	Glenn Lengsavath

25. If any of said property, as a result of any act or omission of the defendants –

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to or deposited with, a third person;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) as been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

any and all interest defendants have in any other property, up to value of the property described in paragraph 2 above, shall be forfeited to the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1), and Rule 32.2

//

//

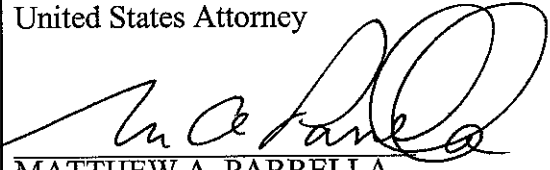
1 of the Federal Rules of Criminal Procedure.


2  
3 DATED: 6/18/08

A TRUE BILL.

4  
5   
6 FOREPERSON

7 JOSEPH P. RUSSONIELLO  
8 United States Attorney

9   
10 MATTHEW A. PARRELLA  
11 Chief, San Jose Branch

12 (Approved as to form:   
13 AUSA Callaway  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28



AO 257 (Rev. 6/78)

**DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT**BY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT  
☐ SUPERSEDING**OFFENSE CHARGED**

SEE PENALTY SHEET ATTACHMENT

**E-FILING**☐ Petty  
☐ Minor  
☐ Misdemeanor  
☒ Felony

PENALTY:

SEE PENALTY SHEET ATTACHMENT

**PROCEEDING**

Name of Complainant Agency, or Person (&amp; Title, if any)

S/A JOHN BARG-SJPD

☐ person is awaiting trial in another Federal or State Court, give name of court☐ this person/proceeding is transferred from another district per (circle one) FRCrP 20, 21 or 40. Show District☐ this is a reprosecution of charges previously dismissed which were dismissed on motion of:☐ U.S. Att'y ☐ Defense☐ this prosecution relates to a pending case involving this same defendant☒ prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded underSHOW  
DOCKET NO.MAGISTRATE  
CASE NO.

08-70318 PVT

Name and Office of Person

Furnishing Information on  
THIS FORM

JOSEPH P. RUSSONIELLO

☒ U.S. Att'y ☐ Other U.S. AgencyName of Asst. U.S. Att'y  
(if assigned)

DAVID R. CALLAWAY

**FILED**Name of District Court, and/or Judge/Magistrate Location  
NORTHERN DISTRICT OF CALIFORNIA2008 JUN 18 P J: 3b  
DEFENDANT - U.S.RICHARD W. WIEKING  
TRUCKEE, CAU.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**JF****CR - 08 00401****DEFENDANT****IS NOT IN CUSTODY****HRL**

- 1) ☐ Has not been arrested, pending outcome this proceeding.  
If not detained give date any prior summons was served on above charges
- 2) ☐ Is a Fugitive
- 3) ☐ Is on Bail or Release from (show District)

**IS IN CUSTODY**

- 4) ☒ On this charge
- 5) ☐ On another conviction
- 6) ☐ Awaiting trial on other charges
- } ☐ Fed'l ☐ State

If answer to (6) is "Yes", show name of institution

Has detainer  
been filed?☐ Yes  
☐ NoIf "Yes"  
give date  
filed**DATE OF  
ARREST**Month/Day/Year  
6/4/2008

Or... if Arresting Agency &amp; Warrant were not

**DATE TRANSFERRED  
TO U.S. CUSTODY**

Month/Day/Year

☐ This report amends AO 257 previously submitted**ADDITIONAL INFORMATION OR COMMENTS****PROCESS:**☐ SUMMONS ☒ NO PROCESS\*☐ WARRANT Bail Amount: \_\_\_\_\_

If Summons, complete following:

☐ Arraignment ☐ Initial Appearance

Defendant Address: \_\_\_\_\_

\*Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Date/Time: \_\_\_\_\_

Before Judge: \_\_\_\_\_

Comments: \_\_\_\_\_

**ATTACHMENT TO PENALTY SHEET**

**UNITED STATES**

**v.**

**TRUC QUOC LE, THUY DANG, LEO LE NGUYEN,  
GLENN LENGSAVATH, TIFFANY VU, THANH LE, TIEN  
LE, JOHANNA RODRIGUEZ, CARMEN SARMIENTO,  
a/k/a Carmen Gutierrez, MANUAL GUTIERREZ, and JUAN  
ESPINOZA, a/k/a Freddy Navarro.**

**COUNT ONE: Title 18, United States Code, Section 371- Conspiracy to Commit Interstate Transportation of Stolen Property**

**Penalties: 5 years imprisonment;  
\$250,000 fine (or twice the gross gain or gross loss);  
Three years supervised release;  
\$100 special assessment.**

**This Count applies to: ALL DEFENDANTS**

**COUNT TWO: Title 18, United States Code, Section 1956(h) – Conspiracy to Commit Money Laundering.**

**Penalties: 20 years imprisonment;  
\$500,000 fine (or twice the gross gain or gross loss);  
Three years supervised release;  
\$100 special assessment.**

**This Count applies to: Truc Quoc Le, Thuy Dang, Leo Le Nguyen, Glenn Lengsavath, Tiffany Vu**

**COUNTS THREE THROUGH EIGHT: Title 18, United States Code, Section 1957 - Monetary Transactions Using Criminally Derived Property.**

**Penalties: 10 years imprisonment;  
\$250,000 fine (or twice the amount of criminally-derived property);  
Three years supervised release;  
\$100 special assessment.**

**These counts apply to: Thuy Dang, Tiffany Vu, and Glenn Lengsavath**

**COUNTS NINE THROUGH THIRTY-ONE:** Title 31, United States Code, Section 5324(a)(3) – Structuring.

**Penalties:** 10 years imprisonment [enhanced penalty; otherwise 5 years];  
\$500,000 fine (or twice the gross gain or gross loss) [same as  
above; otherwise \$250,000 or double the gross gain/loss];  
Three years supervised release;  
\$100 special assessment.

These counts apply to: Truc Quoc Le, Thuy Dang, Leo Le Nguyen, Glenn Lengsavath, Tiffany Vu

**COUNTS THIRTY-TWO THROUGH THIRTY-FOUR:** Title 18, United States Code, Section 2314- Interstate Transportation of Stolen Property.

**Penalties:** 10 years imprisonment;  
\$250,000 fine (or twice the gross gain or gross loss);  
Three years supervised release;  
\$100 special assessment.

These counts apply to: Truc Quoc Le, Thuy Dang, Leo Le Nguyen, Tien Le

**COUNTS THIRTY-FIVE THROUGH THIRTY-SEVEN:** Title 18, United States Code, Section 2314- Interstate Transportation of Stolen Property.

Defendants: Truc Quoc Le, Thuy Dang, Glenn Lengsavath, Tiffany Vu, Thanh Le, and Tien Le

**FORFEITURE ALLEGATION:** Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code 2461(c) – Forfeiture of Proceeds of Specified Unlawful Activity.

Defendants: Truc Quoc Le, Thuy Dang, Glenn Lengsavath, Tiffany Vu,

**SECOND FORFEITURE ALLEGATION :** Title 18, United States Code, Section 982(a)(1) - Money Laundering Forfeiture.

Defendants: Truc Quoc Le, Thuy Dang, Glenn Lengsavath, Tiffany Vu,

**THIRD FORFEITURE ALLEGATION :** Title 31, United States Code, Section 5317 (c) – Structuring Forfeiture.

Defendants: Truc Quoc Le, Thuy Dang, Glenn Lengsavath, Tiffany Vu,

AO 257 (Rev. 6/78)

**DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT**BY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT  
☐ SUPERSEDING**OFFENSE CHARGED**

SEE PENALTY SHEET ATTACHMENT

**E-FILING**☐ Petty  
☐ Minor  
☐ Misdemeanor  
☒ Felony

PENALTY:

SEE PENALTY SHEET ATTACHMENT

**PROCEEDING**

Name of Complainant Agency, or Person (&amp; Title, if any)

S/A JOHN BARG-SJPD

☐ person is awaiting trial in another Federal or State Court, give name of court☐ this person/proceeding is transferred from another district per (circle one) FRCP 20, 21 or 40. Show District☐ this is a prosecution of charges previously dismissed which were dismissed on motion of:☐ U.S. Att'y ☐ Defense☐ this prosecution relates to a pending case involving this same defendant☒ prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded underSHOW  
DOCKET NO.MAGISTRATE  
CASE NO.

08-70318 PVT

Name and Office of Person

Furnishing Information on  
THIS FORM JOSEPH P. RUSSONIELLO☒ U.S. Att'y ☐ Other U.S. AgencyName of Asst. U.S. Att'y  
(if assigned)

DAVID R. CALLAWAY

Name of District Court, and/or Judge/Magistrate Location  
NORTHERN DISTRICT OF CALIFORNIA**FILED**

2008 JUN 18 P 11:36

RICHARD W. KING

CLERK

U.S. DISTRICT COURT  
NO. DIST. OF CA. S.J.**CR - 08 00401****JF****HRL****DEFENDANT****IS NOT IN CUSTODY**

- 1) ☐ Has not been arrested, pending outcome this proceeding.  
If not detained give date any prior summons was served on above charges
- 2) ☐ Is a Fugitive
- 3) ☐ Is on Bail or Release from (show District)

**IS IN CUSTODY**

- 4) ☒ On this charge
- 5) ☐ On another conviction
- 6) ☐ Awaiting trial on other charges } ☐ Fed'l ☐ State
- If answer to (6) is "Yes", show name of institution

Has detainer been filed? ☐ Yes ☐ No

If "Yes" give date filed

**DATE OF  
ARREST**

Month/Day/Year

6/4/2008

Or... if Arresting Agency &amp; Warrant were not

**DATE TRANSFERRED  
TO U.S. CUSTODY**

Month/Day/Year

☐ This report amends AO 257 previously submitted**ADDITIONAL INFORMATION OR COMMENTS****PROCESS:**☐ SUMMONS ☒ NO PROCESS\* ☐ WARRANT Bail Amount: \_\_\_\_\_

If Summons, complete following:

☐ Arraignment ☐ Initial Appearance

Defendant Address: \_\_\_\_\_

\*Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Date/Time: \_\_\_\_\_

Before Judge: \_\_\_\_\_

Comments: \_\_\_\_\_

**ATTACHMENT TO PENALTY SHEET**

**UNITED STATES**

**v.**

**TRUC QUOC LE, THUY DANG, LEO LE NGUYEN,  
GLENN LENGSAVATH, TIFFANY VU, THANH LE, TIEN  
LE, JOHANNA RODRIGUEZ, CARMEN SARMIENTO,  
a/k/a Carmen Gutierrez, MANUAL GUTIERREZ, and JUAN  
ESPINOZA, a/k/a Freddy Navarro.**

**COUNT ONE: Title 18, United States Code, Section 371- Conspiracy to Commit Interstate Transportation of Stolen Property**

**Penalties: 5 years imprisonment;  
\$250,000 fine (or twice the gross gain or gross loss);  
Three years supervised release;  
\$100 special assessment.**

**This Count applies to: ALL DEFENDANTS**

**COUNT TWO: Title 18, United States Code, Section 1956(h) – Conspiracy to Commit Money Laundering.**

**Penalties: 20 years imprisonment;  
\$500,000 fine (or twice the gross gain or gross loss);  
Three years supervised release;  
\$100 special assessment.**

**This Count applies to: Truc Quoc Le, Thuy Dang, Leo Le Nguyen, Glenn Lengsavath, Tiffany Vu**

**COUNTS THREE THROUGH EIGHT: Title 18, United States Code, Section 1957 - Monetary Transactions Using Criminally Derived Property.**

**Penalties: 10 years imprisonment;  
\$250,000 fine (or twice the amount of criminally-derived property);  
Three years supervised release;  
\$100 special assessment.**

**These counts apply to: Thuy Dang, Tiffany Vu, and Glenn Lengsavath**

**COUNTS NINE THROUGH THIRTY-ONE:** Title 31, United States Code, Section 5324(a)(3) – Structuring.

**Penalties:** 10 years imprisonment [enhanced penalty; otherwise 5 years];  
\$500,000 fine (or twice the gross gain or gross loss) [same as  
above; otherwise \$250,000 or double the gross gain/loss];  
Three years supervised release;  
\$100 special assessment.

These counts apply to: Truc Quoc Le, Thuy Dang, Leo Le Nguyen, Glenn Lengsavath, Tiffany Vu

**COUNTS THIRTY-TWO THROUGH THIRTY-FOUR:** Title 18, United States Code, Section 2314- Interstate Transportation of Stolen Property.

**Penalties:** 10 years imprisonment;  
\$250,000 fine (or twice the gross gain or gross loss);  
Three years supervised release;  
\$100 special assessment.

These counts apply to: Truc Quoc Le, Thuy Dang, Leo Le Nguyen, Tien Le

**COUNTS THIRTY-FIVE THROUGH THIRTY-SEVEN:** Title 18, United States Code, Section 2314- Interstate Transportation of Stolen Property.

Defendants: Truc Quoc Le, Thuy Dang, Glenn Lengsavath, Tiffany Vu, Thanh Le, and Tien Le

**FORFEITURE ALLEGATION:** Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code 2461(c) – Forfeiture of Proceeds of Specified Unlawful Activity.

Defendants: Truc Quoc Le, Thuy Dang, Glenn Lengsavath, Tiffany Vu,

**SECOND FORFEITURE ALLEGATION :** Title 18, United States Code, Section 982(a)(1) - Money Laundering Forfeiture.

Defendants: Truc Quoc Le, Thuy Dang, Glenn Lengsavath, Tiffany Vu,

**THIRD FORFEITURE ALLEGATION :** Title 31, United States Code, Section 5317 (c) – Structuring Forfeiture.

Defendants: Truc Quoc Le, Thuy Dang, Glenn Lengsavath, Tiffany Vu,

AO 257 (Rev. 6/78)

**DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT**BY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT  
☐ SUPERSEDING**OFFENSE CHARGED**

SEE PENALTY SHEET ATTACHMENT

**E-FILING**☐ Petty  
☐ Minor  
☐ Misdemeanor  
☒ Felony

PENALTY:

SEE PENALTY SHEET ATTACHMENT

**PROCEEDING**

Name of Complainant Agency, or Person (&amp; Title, if any)

S/A JOHN BARG-SJPD

☐ person is awaiting trial in another Federal or State Court, give name of court☐ this person/proceeding is transferred from another district per (circle one) FRCrP 20, 21 or 40. Show District☐ this is a reprosecution of charges previously dismissed which were dismissed on motion of:☐ U.S. Att'y ☐ Defense☐ this prosecution relates to a pending case involving this same defendant☒ prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under

SHOW DOCKET NO.

MAGISTRATE CASE NO.

08-70318 PVT

Name and Office of Person

Furnishing Information on THIS FORM JOSEPH P. RUSSONIELLO

☒ U.S. Att'y ☐ Other U.S. Agency

Name of Asst. U.S. Att'y (if assigned)

DAVID R. CALLAWAY

Name of District Court, and/or Judge/Magistrate Location  
NORTHERN DISTRICT OF CALIFORNIA**FILED**

DEFENDANT U.S. JUN 18 P 1:34

LEO LE NGUYEN  
RICHARD W. WIEKING  
CLERKDISTRICT COURT NUMBER  
U.S. DIST. OF CALIF. S.D.**CR-08 00401F****HRL****DEFENDANT****IS NOT IN CUSTODY**

- 1) ☒ Has not been arrested, pending outcome this proceeding. If not detained give date any prior summons was served on above charges
- 2) ☐ Is a Fugitive
- 3) ☐ Is on Bail or Release from (show District)

**IS IN CUSTODY**

- 4) ☐ On this charge
- 5) ☐ On another conviction
- 6) ☐ Awaiting trial on other charges } ☐ Fed'l ☐ State

If answer to (6) is "Yes", show name of institution

Has detainer been filed? ☐ Yes ☐ No

If "Yes" give date filed

**DATE OF ARREST**

Month/Day/Year

Or... if Arresting Agency &amp; Warrant were not

**DATE TRANSFERRED TO U.S. CUSTODY**

Month/Day/Year

☐ This report amends AO 257 previously submitted**ADDITIONAL INFORMATION OR COMMENTS****PROCESS:**☐ SUMMONS ☒ NO PROCESS\*☐ WARRANT Bail Amount: \_\_\_\_\_

If Summons, complete following:

☐ Arraignment ☐ Initial Appearance

Defendant Address: \_\_\_\_\_

\*Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Date/Time: \_\_\_\_\_

Before Judge: \_\_\_\_\_

Comments: \_\_\_\_\_

3



**ATTACHMENT TO PENALTY SHEET**

**UNITED STATES**

**v.**

**TRUC QUOC LE, THUY DANG, LEO LE NGUYEN,  
GLENN LENGSAVATH, TIFFANY VU, THANH LE, TIEN  
LE, JOHANNA RODRIGUEZ, CARMEN SARMIENTO,  
a/k/a Carmen Gutierrez, MANUAL GUTIERREZ, and JUAN  
ESPINOZA, a/k/a Freddy Navarro.**

**COUNT ONE: Title 18, United States Code, Section 371- Conspiracy to Commit Interstate Transportation of Stolen Property**

**Penalties: 5 years imprisonment;  
\$250,000 fine (or twice the gross gain or gross loss);  
Three years supervised release;  
\$100 special assessment.**

**This Count applies to: ALL DEFENDANTS**

**COUNT TWO: Title 18, United States Code, Section 1956(h) – Conspiracy to Commit Money Laundering.**

**Penalties: 20 years imprisonment;  
\$500,000 fine (or twice the gross gain or gross loss);  
Three years supervised release;  
\$100 special assessment.**

**This Count applies to: Truc Quoc Le, Thuy Dang, Leo Le Nguyen, Glenn Lengsavath, Tiffany Vu**

**COUNTS THREE THROUGH EIGHT: Title 18, United States Code, Section 1957 - Monetary Transactions Using Criminally Derived Property.**

**Penalties: 10 years imprisonment;  
\$250,000 fine (or twice the amount of criminally-derived property);  
Three years supervised release;  
\$100 special assessment.**

**These counts apply to: Thuy Dang, Tiffany Vu, and Glenn Lengsavath**



**COUNTS NINE THROUGH THIRTY-ONE:** Title 31, United States Code, Section 5324(a)(3) – Structuring.

**Penalties:** 10 years imprisonment [enhanced penalty; otherwise 5 years];  
\$500,000 fine (or twice the gross gain or gross loss) [same as  
above; otherwise \$250,000 or double the gross gain/loss];  
Three years supervised release;  
\$100 special assessment.

These counts apply to: Truc Quoc Le, Thuy Dang, Leo Le Nguyen, Glenn Lengsavath, Tiffany Vu

**COUNTS THIRTY-TWO THROUGH THIRTY-FOUR:** Title 18, United States Code, Section 2314- Interstate Transportation of Stolen Property.

**Penalties:** 10 years imprisonment;  
\$250,000 fine (or twice the gross gain or gross loss);  
Three years supervised release;  
\$100 special assessment.

These counts apply to: Truc Quoc Le, Thuy Dang, Leo Le Nguyen, Tien Le

**COUNTS THIRTY-FIVE THROUGH THIRTY-SEVEN:** Title 18, United States Code, Section 2314- Interstate Transportation of Stolen Property.

Defendants: Truc Quoc Le, Thuy Dang, Glenn Lengsavath, Tiffany Vu, Thanh Le, and Tien Le

**FORFEITURE ALLEGATION:** Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code 2461(c) – Forfeiture of Proceeds of Specified Unlawful Activity.

Defendants: Truc Quoc Le, Thuy Dang, Glenn Lengsavath, Tiffany Vu,

**SECOND FORFEITURE ALLEGATION :** Title 18, United States Code, Section 982(a)(1) - Money Laundering Forfeiture.

Defendants: Truc Quoc Le, Thuy Dang, Glenn Lengsavath, Tiffany Vu,

**THIRD FORFEITURE ALLEGATION :** Title 31, United States Code, Section 5317 (c) – Structuring Forfeiture.

Defendants: Truc Quoc Le, Thuy Dang, Glenn Lengsavath, Tiffany Vu,

AO 257 (Rev. 6/78)

**DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT**BY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT  
☐ SUPERSEDING**OFFENSE CHARGED**

SEE PENALTY SHEET ATTACHMENT

☐ Petty  
☐ Minor  
☐ Misdemeanor  
☒ Felony**E-FILING**

PENALTY:

SEE PENALTY SHEET ATTACHMENT

**PROCEEDING**

Name of Complainant Agency, or Person (&amp; Title, if any)

S/A JOHN BARG-SJPD

☐ person is awaiting trial in another Federal or State Court, give name of court☐ this person/proceeding is transferred from another district per (circle one) FRCrP 20, 21 or 40. Show District☐ this is a reprosecution of charges previously dismissed which were dismissed on motion of:☐ U.S. Att'y ☐ Defense☐ this prosecution relates to a pending case involving this same defendant☒ prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded underSHOW  
DOCKET NO.MAGISTRATE  
CASE NO.

08-70318 PVT

Name and Office of Person  
Furnishing Information on  
THIS FORM

JOSEPH P. RUSSONIELLO

☒ U.S. Att'y ☐ Other U.S. AgencyName of Asst. U.S. Att'y  
(if assigned)

DAVID R. CALLAWAY

Name of District Court, and/or Judge/Magistrate Location  
NORTHERN DISTRICT OF CALIFORNIA2008 JUN 18 P 1:35  
DEFENDANT - U.S.RICHARD W. WIEKING  
GLENN LINGSMITH,  
U.S. DISTRICT COURT  
DISTRICT OF CALIFORNIA**JF****CR - 08 00401****DEFENDANT****IS NOT IN CUSTODY**

- 1) ☐ Has not been arrested, pending outcome this proceeding. If not detained give date any prior summons was served on above charges
- 2) ☐ Is a Fugitive
- 3) ☐ Is on Bail or Release from (show District)

**IS IN CUSTODY**

- 4) ☒ On this charge
- 5) ☐ On another conviction
- 6) ☐ Awaiting trial on other charges } ☐ Fed'l ☐ State
- If answer to (6) is "Yes", show name of institution

Has detainer  
been filed? ☐ Yes ☐ NoIf "Yes"  
give date  
filed**DATE OF  
ARREST**

Month/Day/Year

6/4/2008

Or... if Arresting Agency &amp; Warrant were not

**DATE TRANSFERRED  
TO U.S. CUSTODY**

Month/Day/Year

☐ This report amends AO 257 previously submitted**ADDITIONAL INFORMATION OR COMMENTS****PROCESS:**☐ SUMMONS ☒ NO PROCESS\*☐ WARRANT Bail Amount: \_\_\_\_\_

If Summons, complete following:

☐ Arraignment ☐ Initial Appearance

Defendant Address: \_\_\_\_\_

\*Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Date/Time: \_\_\_\_\_

Before Judge: \_\_\_\_\_

Comments: \_\_\_\_\_

ATTACHMENT TO PENALTY SHEET

UNITED STATES

v.

TRUC QUOC LE, THUY DANG, LEO LE NGUYEN,  
GLENN LENGSAVATH, TIFFANY VU, THANH LE, TIEN  
LE, JOHANNA RODRIGUEZ, CARMEN SARMIENTO,  
a/k/a Carmen Gutierrez, MANUAL GUTIERREZ, and JUAN  
ESPINOZA, a/k/a Freddy Navarro.

**COUNT ONE:** Title 18, United States Code, Section 371- Conspiracy to Commit Interstate Transportation of Stolen Property

**Penalties:** 5 years imprisonment;  
\$250,000 fine (or twice the gross gain or gross loss);  
Three years supervised release;  
\$100 special assessment.

This Count applies to: ALL DEFENDANTS

**COUNT TWO:** Title 18, United States Code, Section 1956(h) – Conspiracy to Commit Money Laundering.

**Penalties:** 20 years imprisonment;  
\$500,000 fine (or twice the gross gain or gross loss);  
Three years supervised release;  
\$100 special assessment.

This Count applies to: Truc Quoc Le, Thuy Dang, Leo Le Nguyen, Glenn Lengsavath, Tiffany Vu

**COUNTS THREE THROUGH EIGHT:** Title 18, United States Code, Section 1957 - Monetary Transactions Using Criminally Derived Property.

**Penalties:** 10 years imprisonment;  
\$250,000 fine (or twice the amount of criminally-derived property);  
Three years supervised release;  
\$100 special assessment.

These counts apply to: Thuy Dang, Tiffany Vu, and Glenn Lengsavath

**COUNTS NINE THROUGH THIRTY-ONE:** Title 31, United States Code, Section 5324(a)(3) – Structuring.

**Penalties:** 10 years imprisonment [enhanced penalty; otherwise 5 years];  
\$500,000 fine (or twice the gross gain or gross loss) [same as  
above; otherwise \$250,000 or double the gross gain/loss];  
Three years supervised release;  
\$100 special assessment.

These counts apply to: Truc Quoc Le, Thuy Dang, Leo Le Nguyen, Glenn Lengsavath, Tiffany Vu

**COUNTS THIRTY-TWO THROUGH THIRTY-FOUR:** Title 18, United States Code, Section 2314- Interstate Transportation of Stolen Property.

**Penalties:** 10 years imprisonment;  
\$250,000 fine (or twice the gross gain or gross loss);  
Three years supervised release;  
\$100 special assessment.

These counts apply to: Truc Quoc Le, Thuy Dang, Leo Le Nguyen, Tien Le

**COUNTS THIRTY-FIVE THROUGH THIRTY-SEVEN:** Title 18, United States Code, Section 2314- Interstate Transportation of Stolen Property.

Defendants: Truc Quoc Le, Thuy Dang, Glenn Lengsavath, Tiffany Vu, Thanh Le, and Tien Le

**FORFEITURE ALLEGATION:** Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code 2461(c) – Forfeiture of Proceeds of Specified Unlawful Activity.

Defendants: Truc Quoc Le, Thuy Dang, Glenn Lengsavath, Tiffany Vu,

**SECOND FORFEITURE ALLEGATION :** Title 18, United States Code, Section 982(a)(1) - Money Laundering Forfeiture.

Defendants: Truc Quoc Le, Thuy Dang, Glenn Lengsavath, Tiffany Vu,

**THIRD FORFEITURE ALLEGATION :** Title 31, United States Code, Section 5317 (c) – Structuring Forfeiture.

Defendants: Truc Quoc Le, Thuy Dang, Glenn Lengsavath, Tiffany Vu,

AO 257 (Rev. 6/78)

**DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT**BY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT  
☐ SUPERSEDING**OFFENSE CHARGED**

SEE PENALTY SHEET ATTACHMENT

**E-FILED**

- ☐
- Petty
- 
- ☐
- Minor
- 
- ☐
- Misdemeanor
- 
- ☒
- Felony

PENALTY:

SEE PENALTY SHEET ATTACHMENT

**PROCEEDING**

Name of Complainant Agency, or Person (&amp; Title, if any)

S/A JOHN BARG-SJPD

- ☐
- person is awaiting trial in another Federal or State Court, give name of court

- ☐
- this person/proceeding is transferred from another district per (circle one) FRCrP 20, 21 or 40. Show District

- ☐
- this is a reprosecution of charges previously dismissed which were dismissed on motion of:

☐ U.S. Att'y ☐ Defense

- ☐
- this prosecution relates to a pending case involving this same defendant

- ☒
- prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under

SHOW  
DOCKET NO.MAGISTRATE  
CASE NO.

08-70318 PVT

Name and Office of Person

Furnishing Information on  
THIS FORM

JOSEPH P. RUSSONIELLO

☒ U.S. Att'y ☐ Other U.S. Agency
Name of Asst. U.S. Att'y  
(if assigned)

DAVID R. CALLAWAY

Name of District Court, and/or Judge/Magistrate Location  
NORTHERN DISTRICT OF CALIFORNIA

2008 JUN 18 P. U.S. 35

CHAD W. WUEKING  
CLERKU.S. DISTRICT COURT NUMBER  
NO. DIST. OF CA, S.J.**CR - 08 00401****JF****HRL****DEFENDANT****IS NOT IN CUSTODY**

- Has not been arrested, pending outcome this proceeding.
- 1) ☐ If not detained give date any prior summons was served on above charges
- 2) ☐ Is a Fugitive
- 3) ☐ Is on Bail or Release from (show District)

**IS IN CUSTODY**

- 4) ☒ On this charge
- 5) ☐ On another conviction
- 6) ☐ Awaiting trial on other charges } ☐ Fed'l ☐ State
- If answer to (6) is "Yes", show name of institution

Has detainer been filed? ☐ Yes ☐ No

If "Yes" give date filed

**DATE OF  
ARREST**

Month/Day/Year

6/4/2008

Or... If Arresting Agency &amp; Warrant were not

**DATE TRANSFERRED  
TO U.S. CUSTODY**

Month/Day/Year

☐ This report amends AO 257 previously submitted**ADDITIONAL INFORMATION OR COMMENTS****PROCESS:**☐ SUMMONS ☒ NO PROCESS\*☐ WARRANT

Bail Amount: \_\_\_\_\_

If Summons, complete following:

☐ Arraignment ☐ Initial Appearance

Defendant Address: \_\_\_\_\_

\*Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Date/Time: \_\_\_\_\_

Before Judge: \_\_\_\_\_

Comments: \_\_\_\_\_

ATTACHMENT TO PENALTY SHEET

UNITED STATES

v.

TRUC QUOC LE, THUY DANG, LEO LE NGUYEN,  
GLENN LENGSAVATH, TIFFANY VU, THANH LE, TIEN  
LE, JOHANNA RODRIGUEZ, CARMEN SARMIENTO,  
a/k/a Carmen Gutierrez, MANUAL GUTIERREZ, and JUAN  
ESPINOZA, a/k/a Freddy Navarro.

**COUNT ONE:** Title 18, United States Code, Section 371- Conspiracy to Commit Interstate Transportation of Stolen Property

**Penalties:** 5 years imprisonment;  
\$250,000 fine (or twice the gross gain or gross loss);  
Three years supervised release;  
\$100 special assessment.

This Count applies to: ALL DEFENDANTS

**COUNT TWO:** Title 18, United States Code, Section 1956(h) – Conspiracy to Commit Money Laundering.

**Penalties:** 20 years imprisonment;  
\$500,000 fine (or twice the gross gain or gross loss);  
Three years supervised release;  
\$100 special assessment.

This Count applies to: Truc Quoc Le, Thuy Dang, Leo Le Nguyen, Glenn Lengsavath, Tiffany Vu

**COUNTS THREE THROUGH EIGHT:** Title 18, United States Code, Section 1957 - Monetary Transactions Using Criminally Derived Property.

**Penalties:** 10 years imprisonment;  
\$250,000 fine (or twice the amount of criminally-derived property);  
Three years supervised release;  
\$100 special assessment.

These counts apply to: Thuy Dang, Tiffany Vu, and Glenn Lengsavath

**COUNTS NINE THROUGH THIRTY-ONE:** Title 31, United States Code, Section 5324(a)(3) – Structuring.

**Penalties:** 10 years imprisonment [enhanced penalty; otherwise 5 years];  
\$500,000 fine (or twice the gross gain or gross loss) [same as above; otherwise \$250,000 or double the gross gain/loss];  
Three years supervised release;  
\$100 special assessment.

These counts apply to: Truc Quoc Le, Thuy Dang, Leo Le Nguyen, Glenn Lengsavath, Tiffany Vu

**COUNTS THIRTY-TWO THROUGH THIRTY-FOUR:** Title 18, United States Code, Section 2314- Interstate Transportation of Stolen Property.

**Penalties:** 10 years imprisonment;  
\$250,000 fine (or twice the gross gain or gross loss);  
Three years supervised release;  
\$100 special assessment.

These counts apply to: Truc Quoc Le, Thuy Dang, Leo Le Nguyen, Tien Le

**COUNTS THIRTY-FIVE THROUGH THIRTY-SEVEN:** Title 18, United States Code, Section 2314- Interstate Transportation of Stolen Property.

Defendants: Truc Quoc Le, Thuy Dang, Glenn Lengsavath, Tiffany Vu, Thanh Le, and Tien Le

**FORFEITURE ALLEGATION:** Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code 2461(c) – Forfeiture of Proceeds of Specified Unlawful Activity.

Defendants: Truc Quoc Le, Thuy Dang, Glenn Lengsavath, Tiffany Vu,

**SECOND FORFEITURE ALLEGATION :** Title 18, United States Code, Section 982(a)(1) - Money Laundering Forfeiture.

Defendants: Truc Quoc Le, Thuy Dang, Glenn Lengsavath, Tiffany Vu,

**THIRD FORFEITURE ALLEGATION :** Title 31, United States Code, Section 5317 (c) – Structuring Forfeiture.

Defendants: Truc Quoc Le, Thuy Dang, Glenn Lengsavath, Tiffany Vu,



AO 257 (Rev. 6/78)

**DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT**
 BY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT  
☐ SUPERSEDING
**OFFENSE CHARGED**

SEE PENALTY SHEET ATTACHMENT

☐ Petty  
☐ Minor  
☐ Misdemeanor  
☒ Felony

PENALTY:

SEE PENALTY SHEET ATTACHMENT

**E-FILING****PROCEEDING**

Name of Complainant Agency, or Person (&amp; Title, if any)

S/A JOHN BARG-SJPD

☐ person is awaiting trial in another Federal or State Court, give name of court

☐ this person/proceeding is transferred from another district per (circle one) FRCrP 20, 21 or 40. Show District

☐ this is a reprosecution of charges previously dismissed which were dismissed on motion of:

☐ U.S. Att'y ☐ Defense

☐ this prosecution relates to a pending case involving this same defendant

☒ prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under

SHOW DOCKET NO.

MAGISTRATE CASE NO.

08-70318 PVT

 Name and Office of Person  
 Furnishing Information on  
 THIS FORM

JOSEPH P. RUSSONIELLO

☒ U.S. Att'y ☐ Other U.S. Agency

 Name of Asst. U.S. Att'y  
 (if assigned)

DAVID R. CALLAWAY

 Name of District Court and/or Judge/Magistrate Location  
 NORTHERN DISTRICT OF CALIFORNIA

2008 JUN 18 P 1:35

RICHARD W. WIEKING

THANH LE CLERK

U.S. DISTRICT COURT  
NO. DIST. OF CA. S.J.**JF****CR - 08 00401****HRL****DEFENDANT****IS NOT IN CUSTODY**

- 1) ☐ Has not been arrested, pending outcome this proceeding.  
 If not detained give date any prior summons was served on above charges
- 2) ☐ Is a Fugitive
- 3) ☐ Is on Bail or Release from (show District)

**IS IN CUSTODY**

- 4) ☒ On this charge
- 5) ☐ On another conviction
- 6) ☐ Awaiting trial on other charges } ☐ Fed'l ☐ State

If answer to (6) is "Yes", show name of institution

 Has detainer been filed? ☐ Yes ☐ No

If "Yes" give date filed

DATE OF ARREST

 Month/Day/Year  
 6/4/2008

Or... if Arresting Agency &amp; Warrant were not

DATE TRANSFERRED TO U.S. CUSTODY

Month/Day/Year

☐ This report amends AO 257 previously submitted
**ADDITIONAL INFORMATION OR COMMENTS****PROCESS:**
☐ SUMMONS ☒ NO PROCESS\*

☐ WARRANT Bail Amount:

If Summons, complete following:

☐ Arraignment ☐ Initial Appearance

Defendant Address:

\*Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Date/Time:

Before Judge:

Comments:

**ATTACHMENT TO PENALTY SHEET**

**UNITED STATES**

**v.**

**TRUC QUOC LE, THUY DANG, LEO LE NGUYEN,  
GLENN LENGSAVATH, TIFFANY VU, THANH LE, TIEN  
LE, JOHANNA RODRIGUEZ, CARMEN SARMIENTO,  
a/k/a Carmen Gutierrez, MANUAL GUTIERREZ, and JUAN  
ESPINOZA, a/k/a Freddy Navarro.**

**COUNT ONE: Title 18, United States Code, Section 371- Conspiracy to Commit Interstate Transportation of Stolen Property**

**Penalties: 5 years imprisonment;  
\$250,000 fine (or twice the gross gain or gross loss);  
Three years supervised release;  
\$100 special assessment.**

**This Count applies to: ALL DEFENDANTS**

**COUNT TWO: Title 18, United States Code, Section 1956(h) – Conspiracy to Commit Money Laundering.**

**Penalties: 20 years imprisonment;  
\$500,000 fine (or twice the gross gain or gross loss);  
Three years supervised release;  
\$100 special assessment.**

**This Count applies to: Truc Quoc Le, Thuy Dang, Leo Le Nguyen, Glenn Lengsavath, Tiffany Vu**

**COUNTS THREE THROUGH EIGHT: Title 18, United States Code, Section 1957 - Monetary Transactions Using Criminally Derived Property.**

**Penalties: 10 years imprisonment;  
\$250,000 fine (or twice the amount of criminally-derived property);  
Three years supervised release;  
\$100 special assessment.**

**These counts apply to: Thuy Dang, Tiffany Vu, and Glenn Lengsavath**

**COUNTS NINE THROUGH THIRTY-ONE:** Title 31, United States Code, Section 5324(a)(3) – Structuring.

**Penalties:** 10 years imprisonment [enhanced penalty; otherwise 5 years];  
\$500,000 fine (or twice the gross gain or gross loss) [same as  
above; otherwise \$250,000 or double the gross gain/loss];  
Three years supervised release;  
\$100 special assessment.

These counts apply to: Truc Quoc Le, Thuy Dang, Leo Le Nguyen, Glenn Lengsavath, Tiffany Vu

**COUNTS THIRTY-TWO THROUGH THIRTY-FOUR:** Title 18, United States Code, Section 2314- Interstate Transportation of Stolen Property.

**Penalties:** 10 years imprisonment;  
\$250,000 fine (or twice the gross gain or gross loss);  
Three years supervised release;  
\$100 special assessment.

These counts apply to: Truc Quoc Le, Thuy Dang, Leo Le Nguyen, Tien Le

**COUNTS THIRTY-FIVE THROUGH THIRTY-SEVEN:** Title 18, United States Code, Section 2314- Interstate Transportation of Stolen Property.

Defendants: Truc Quoc Le, Thuy Dang, Glenn Lengsavath, Tiffany Vu, Thanh Le, and Tien Le

**FORFEITURE ALLEGATION:** Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code 2461(c) – Forfeiture of Proceeds of Specified Unlawful Activity.

Defendants: Truc Quoc Le, Thuy Dang, Glenn Lengsavath, Tiffany Vu,

**SECOND FORFEITURE ALLEGATION :** Title 18, United States Code, Section 982(a)(1) - Money Laundering Forfeiture.

Defendants: Truc Quoc Le, Thuy Dang, Glenn Lengsavath, Tiffany Vu,

**THIRD FORFEITURE ALLEGATION :** Title 31, United States Code, Section 5317 (c) – Structuring Forfeiture.

Defendants: Truc Quoc Le, Thuy Dang, Glenn Lengsavath, Tiffany Vu,

AO 257 (Rev. 6/78)

**DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT**BY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT  
☐ SUPERSEDING**OFFENSE CHARGED**

SEE PENALTY SHEET ATTACHMENT

**E-FILING**☐ Petty  
☐ Minor  
☐ Misdemeanor  
☒ Felony

PENALTY:

SEE PENALTY SHEET ATTACHMENT

**PROCEEDING**

Name of Complainant Agency, or Person (&amp; Title, if any)

S/A JOHN BARG-SJPD

☐ person is awaiting trial in another Federal or State Court, give name of court☐ this person/proceeding is transferred from another district per (circle one) FRCP 20, 21 or 40. Show District☐ this is a reprosecution of charges previously dismissed which were dismissed on motion of:☐ U.S. Att'y ☐ Defense☐ this prosecution relates to a pending case involving this same defendant☒ prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under

SHOW DOCKET NO.

MAGISTRATE CASE NO.

08-70318 PVT

Name and Office of Person

Furnishing Information on THIS FORM

JOSEPH P. RUSSONIELLO

☒ U.S. Att'y ☐ Other U.S. Agency

Name of Asst. U.S. Att'y (if assigned)

DAVID R. CALLAWAY

Name of District Court, and/or Judge/Magistrate Location  
NORTHERN DISTRICT OF CALIFORNIA

DEFENDANT - U.S.

TIEN LE

RICHARD W. WIEKING

CLERK

U.S. DISTRICT COURT  
NORTHERN DIST. OF CALIF.**CR-08 00401****HRL****DEFENDANT****IS NOT IN CUSTODY**

- 1) ☐ Has not been arrested, pending outcome this proceeding. If not detained give date any prior summons was served on above charges
- 2) ☐ Is a Fugitive
- 3) ☐ Is on Bail or Release from (show District)

**IS IN CUSTODY**

- 4) ☒ On this charge
- 5) ☐ On another conviction
- 6) ☐ Awaiting trial on other charges
- } ☐ Fed'l ☐ State

If answer to (6) is "Yes", show name of institution

Has detainer been filed?

☐ Yes  
☐ No

If "Yes" give date filed

**DATE OF ARREST**

Month/Day/Year

6/4/2008

Or... if Arresting Agency &amp; Warrant were not

**DATE TRANSFERRED TO U.S. CUSTODY**

Month/Day/Year

☐ This report amends AO 257 previously submitted**ADDITIONAL INFORMATION OR COMMENTS****PROCESS:**☐ SUMMONS ☒ NO PROCESS\*☐ WARRANT

Bail Amount: \_\_\_\_\_

If Summons, complete following:

☐ Arraignment ☐ Initial Appearance

Defendant Address: \_\_\_\_\_

\*Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Date/Time: \_\_\_\_\_

Before Judge: \_\_\_\_\_

Comments: \_\_\_\_\_

**ATTACHMENT TO PENALTY SHEET**

**UNITED STATES**

**v.**

**TRUC QUOC LE, THUY DANG, LEO LE NGUYEN,  
GLENN LENGSAVATH, TIFFANY VU, THANH LE, TIEN  
LE, JOHANNA RODRIGUEZ, CARMEN SARMIENTO,  
a/k/a Carmen Gutierrez, MANUAL GUTIERREZ, and JUAN  
ESPINOZA, a/k/a Freddy Navarro.**

**COUNT ONE: Title 18, United States Code, Section 371- Conspiracy to Commit Interstate Transportation of Stolen Property**

**Penalties:     5 years imprisonment;  
                     \$250,000 fine (or twice the gross gain or gross loss);  
                     Three years supervised release;  
                     \$100 special assessment.**

**This Count applies to: ALL DEFENDANTS**

**COUNT TWO: Title 18, United States Code, Section 1956(h) – Conspiracy to Commit Money Laundering.**

**Penalties:     20 years imprisonment;  
                     \$500,000 fine (or twice the gross gain or gross loss);  
                     Three years supervised release;  
                     \$100 special assessment.**

**This Count applies to: Truc Quoc Le, Thuy Dang, Leo Le Nguyen, Glenn Lengsavath, Tiffany Vu**

**COUNTS THREE THROUGH EIGHT: Title 18, United States Code, Section 1957 - Monetary Transactions Using Criminally Derived Property.**

**Penalties:     10 years imprisonment;  
                     \$250,000 fine (or twice the amount of criminally-derived property);  
                     Three years supervised release;  
                     \$100 special assessment.**

**These counts apply to: Thuy Dang, Tiffany Vu, and Glenn Lengsavath**

**COUNTS NINE THROUGH THIRTY-ONE:** Title 31, United States Code, Section 5324(a)(3) – Structuring.

**Penalties:** 10 years imprisonment [enhanced penalty; otherwise 5 years];  
\$500,000 fine (or twice the gross gain or gross loss) [same as  
above; otherwise \$250,000 or double the gross gain/loss];  
Three years supervised release;  
\$100 special assessment.

These counts apply to: Truc Quoc Le, Thuy Dang, Leo Le Nguyen, Glenn Lengsavath, Tiffany Vu

**COUNTS THIRTY-TWO THROUGH THIRTY-FOUR:** Title 18, United States Code, Section 2314- Interstate Transportation of Stolen Property.

**Penalties:** 10 years imprisonment;  
\$250,000 fine (or twice the gross gain or gross loss);  
Three years supervised release;  
\$100 special assessment.

These counts apply to: Truc Quoc Le, Thuy Dang, Leo Le Nguyen, Tien Le

**COUNTS THIRTY-FIVE THROUGH THIRTY-SEVEN:** Title 18, United States Code, Section 2314- Interstate Transportation of Stolen Property.

Defendants: Truc Quoc Le, Thuy Dang, Glenn Lengsavath, Tiffany Vu, Thanh Le, and Tien Le

**FORFEITURE ALLEGATION:** Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code 2461(c) – Forfeiture of Proceeds of Specified Unlawful Activity.

Defendants: Truc Quoc Le, Thuy Dang, Glenn Lengsavath, Tiffany Vu,

**SECOND FORFEITURE ALLEGATION :** Title 18, United States Code, Section 982(a)(1) - Money Laundering Forfeiture.

Defendants: Truc Quoc Le, Thuy Dang, Glenn Lengsavath, Tiffany Vu,

**THIRD FORFEITURE ALLEGATION :** Title 31, United States Code, Section 5317 (c) – Structuring Forfeiture.

Defendants: Truc Quoc Le, Thuy Dang, Glenn Lengsavath, Tiffany Vu,

AO 257 (Rev. 6/78)

**DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT**BY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT  
☐ SUPERSEDING**OFFENSE CHARGED**

SEE PENALTY SHEET ATTACHMENT

**E-FILING**☐ Petty  
☐ Minor  
☐ Misdemeanor  
☒ Felony

PENALTY:

SEE PENALTY SHEET ATTACHMENT

**PROCEEDING**

Name of Complainant Agency, or Person (&amp; Title, if any)

S/A JOHN BARG-SJPD

☐ person is awaiting trial in another Federal or State Court, give name of court☐ this person/proceeding is transferred from another district per (circle one) FRCrP 20, 21 or 40. Show District☐ this is a reprosecution of charges previously dismissed which were dismissed on motion of:☐ U.S. Att'y ☐ Defense☐ this prosecution relates to a pending case involving this same defendant☒ prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded underSHOW  
DOCKET NO.MAGISTRATE  
CASE NO.

08-70318 PVT

Name and Office of Person

Furnishing Information on  
THIS FORM

JOSEPH P. RUSSONIELLO

☒ U.S. Att'y ☐ Other U.S. AgencyName of Asst. U.S. Att'y  
(if assigned)

DAVID R. CALLAWAY

Name of District Court, and/or Judge/Magistrate Location  
NORTHERN DISTRICT OF CALIFORNIA

DEFENDANT 2008 JUN 18 P 1:34

JOHANNA RODRIGUEZ W. WIEKING

CLERK

DISTRICT COURT NO. DIST. OF CA. S.J.

**CR - 08 00401****JF****HRL****DEFENDANT****IS NOT IN CUSTODY**

- 1) ☐ Has not been arrested, pending outcome this proceeding.  
If not detained give date any prior summons was served on above charges
- 2) ☐ Is a Fugitive
- 3) ☐ Is on Bail or Release from (show District)

**IS IN CUSTODY**

- 4) ☐ On this charge
- 5) ☐ On another conviction
- 6) ☒ Awaiting trial on other charges } ☐ Fed'l ☒ State

If answer to (6) is "Yes", show name of institution

LOS ANGELES

Has detainer been filed? ☒ Yes ☐ No

If "Yes" give date filed 6/16/2008

DATE OF  
ARREST

Month/Day/Year

5/20/2008

Or... if Arresting Agency &amp; Warrant were not

Month/Day/Year

DATE TRANSFERRED  
TO U.S. CUSTODY☐ This report amends AO 257 previously submitted**ADDITIONAL INFORMATION OR COMMENTS****PROCESS:**☐ SUMMONS ☒ NO PROCESS\*☐ WARRANT

Bail Amount: \_\_\_\_\_

If Summons, complete following:

☐ Arraignment ☐ Initial Appearance

Defendant Address: \_\_\_\_\_

\*Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Date/Time: \_\_\_\_\_

Before Judge: \_\_\_\_\_

Comments: \_\_\_\_\_



**ATTACHMENT TO PENALTY SHEET**

**UNITED STATES**

**v.**

**TRUC QUOC LE, THUY DANG, LEO LE NGUYEN,  
GLENN LENGSAVATH, TIFFANY VU, THANH LE, TIEN  
LE, JOHANNA RODRIGUEZ, CARMEN SARMIENTO,  
a/k/a Carmen Gutierrez, MANUAL GUTIERREZ, and JUAN  
ESPINOZA, a/k/a Freddy Navarro.**

**COUNT ONE: Title 18, United States Code, Section 371- Conspiracy to Commit Interstate Transportation of Stolen Property**

**Penalties:     5 years imprisonment;  
                     \$250,000 fine (or twice the gross gain or gross loss);  
                     Three years supervised release;  
                     \$100 special assessment.**

**This Count applies to: ALL DEFENDANTS**

**COUNT TWO: Title 18, United States Code, Section 1956(h) – Conspiracy to Commit Money Laundering.**

**Penalties:     20 years imprisonment;  
                     \$500,000 fine (or twice the gross gain or gross loss);  
                     Three years supervised release;  
                     \$100 special assessment.**

**This Count applies to: Truc Quoc Le, Thuy Dang, Leo Le Nguyen, Glenn Lengsavath, Tiffany Vu**

**COUNTS THREE THROUGH EIGHT: Title 18, United States Code, Section 1957 - Monetary Transactions Using Criminally Derived Property.**

**Penalties:     10 years imprisonment;  
                     \$250,000 fine (or twice the amount of criminally-derived property);  
                     Three years supervised release;  
                     \$100 special assessment.**

**These counts apply to: Thuy Dang, Tiffany Vu, and Glenn Lengsavath**

**COUNTS NINE THROUGH THIRTY-ONE:** Title 31, United States Code, Section 5324(a)(3) – Structuring.

**Penalties:** 10 years imprisonment [enhanced penalty; otherwise 5 years];  
\$500,000 fine (or twice the gross gain or gross loss) [same as above; otherwise \$250,000 or double the gross gain/loss];  
Three years supervised release;  
\$100 special assessment.

These counts apply to: Truc Quoc Le, Thuy Dang, Leo Le Nguyen, Glenn Lengsavath, Tiffany Vu

**COUNTS THIRTY-TWO THROUGH THIRTY-FOUR:** Title 18, United States Code, Section 2314- Interstate Transportation of Stolen Property.

**Penalties:** 10 years imprisonment;  
\$250,000 fine (or twice the gross gain or gross loss);  
Three years supervised release;  
\$100 special assessment.

These counts apply to: Truc Quoc Le, Thuy Dang, Leo Le Nguyen, Tien Le

**COUNTS THIRTY-FIVE THROUGH THIRTY-SEVEN:** Title 18, United States Code, Section 2314- Interstate Transportation of Stolen Property.

Defendants: Truc Quoc Le, Thuy Dang, Glenn Lengsavath, Tiffany Vu, Thanh Le, and Tien Le

**FORFEITURE ALLEGATION:** Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code 2461(c) – Forfeiture of Proceeds of Specified Unlawful Activity.

Defendants: Truc Quoc Le, Thuy Dang, Glenn Lengsavath, Tiffany Vu,

**SECOND FORFEITURE ALLEGATION :** Title 18, United States Code, Section 982(a)(1) - Money Laundering Forfeiture.

Defendants: Truc Quoc Le, Thuy Dang, Glenn Lengsavath, Tiffany Vu,

**THIRD FORFEITURE ALLEGATION :** Title 31, United States Code, Section 5317 (c) – Structuring Forfeiture.

Defendants: Truc Quoc Le, Thuy Dang, Glenn Lengsavath, Tiffany Vu,

AO 257 (Rev. 6/78)

**DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT**BY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT  
☐ SUPERSEDING**OFFENSE CHARGED**

SEE PENALTY SHEET ATTACHMENT

- ☐ Petty  
☐ Minor  
☐ Misdemeanor  
☒ Felony

PENALTY:

SEE PENALTY SHEET ATTACHMENT

**PROCEEDING**

Name of Complainant Agency, or Person (&amp; Title, if any)

S/A JOHN BARG-SJPD

☐ person is awaiting trial in another Federal or State Court, give name of court☐ this person/proceeding is transferred from another district per (circle one) FRCrP 20, 21 or 40. Show District☐ this is a reprosecution of charges previously dismissed which were dismissed on motion of:☐ U.S. Att'y ☐ Defense☐ this prosecution relates to a pending case involving this same defendant☒ prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded underSHOW  
DOCKET NO.MAGISTRATE  
CASE NO.

08-70318 PVT

Name and Office of Person

Furnishing Information on  
THIS FORM

JOSEPH P. RUSSONIELLO

☒ U.S. Att'y ☐ Other U.S. AgencyName of Asst. U.S. Att'y  
(if assigned)

DAVID R. CALLAWAY

Name of District Court, and/or Judge/Magistrate Location  
NORTHERN DISTRICT OF CALIFORNIA

2008 JUN 18 P - U.S. DISTRICT COURT

CHARO V. VIKME  
CLERKU.S. DISTRICT COURT  
NO. DIST. OF CA. S.J.**CR - 08 00401****DEFENDANT****IS NOT IN CUSTODY**

- 1) ☐ Has not been arrested, pending outcome this proceeding. If not detained give date any prior summons was served on above charges
- 2) ☐ Is a Fugitive
- 3) ☐ Is on Bail or Release from (show District)

**IS IN CUSTODY**

- 4) ☐ On this charge
- 5) ☐ On another conviction
- 6) ☒ Awaiting trial on other charges

☐ Fed'l ☒ State

If answer to (6) is "Yes", show name of institution

LOS ANGELES

Has detainer been filed? ☒ Yes ☐ No

If "Yes" give date filed 6/16/2008

DATE OF  
ARREST

Month/Day/Year

5/20/2008

Or... if Arresting Agency &amp; Warrant were not

DATE TRANSFERRED  
TO U.S. CUSTODY

Month/Day/Year

☐ This report amends AO 257 previously submitted**ADDITIONAL INFORMATION OR COMMENTS****PROCESS:**☐ SUMMONS ☒ NO PROCESS\*☐ WARRANT Bail Amount: \_\_\_\_\_

If Summons, complete following:

☐ Arraignment ☐ Initial Appearance

Defendant Address: \_\_\_\_\_

\*Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Date/Time: \_\_\_\_\_

Before Judge: \_\_\_\_\_

Comments: \_\_\_\_\_

**ATTACHMENT TO PENALTY SHEET**

**UNITED STATES**

**v.**

**TRUC QUOC LE, THUY DANG, LEO LE NGUYEN,  
GLENN LENGSAVATH, TIFFANY VU, THANH LE, TIEN  
LE, JOHANNA RODRIGUEZ, CARMEN SARMIENTO,  
a/k/a Carmen Gutierrez, MANUAL GUTIERREZ, and JUAN  
ESPINOZA, a/k/a Freddy Navarro.**

**COUNT ONE: Title 18, United States Code, Section 371- Conspiracy to Commit Interstate Transportation of Stolen Property**

**Penalties: 5 years imprisonment;  
\$250,000 fine (or twice the gross gain or gross loss);  
Three years supervised release;  
\$100 special assessment.**

**This Count applies to: ALL DEFENDANTS**

**COUNT TWO: Title 18, United States Code, Section 1956(h) – Conspiracy to Commit Money Laundering.**

**Penalties: 20 years imprisonment;  
\$500,000 fine (or twice the gross gain or gross loss);  
Three years supervised release;  
\$100 special assessment.**

**This Count applies to: Truc Quoc Le, Thuy Dang, Leo Le Nguyen, Glenn Lengsavath, Tiffany Vu**

**COUNTS THREE THROUGH EIGHT: Title 18, United States Code, Section 1957 - Monetary Transactions Using Criminally Derived Property.**

**Penalties: 10 years imprisonment;  
\$250,000 fine (or twice the amount of criminally-derived property);  
Three years supervised release;  
\$100 special assessment.**

**These counts apply to: Thuy Dang, Tiffany Vu, and Glenn Lengsavath**

**COUNTS NINE THOUGH THIRTY-ONE:** Title 31, United States Code, Section 5324(a)(3) – Structuring.

**Penalties:** 10 years imprisonment [enhanced penalty; otherwise 5 years];  
\$500,000 fine (or twice the gross gain or gross loss) [same as above; otherwise \$250,000 or double the gross gain/loss];  
Three years supervised release;  
\$100 special assessment.

These counts apply to: Truc Quoc Le, Thuy Dang, Leo Le Nguyen, Glenn Lengsavath, Tiffany Vu

**COUNTS THIRTY-TWO THROUGH THIRTY-FOUR:** Title 18, United States Code, Section 2314- Interstate Transportation of Stolen Property.

**Penalties:** 10 years imprisonment;  
\$250,000 fine (or twice the gross gain or gross loss);  
Three years supervised release;  
\$100 special assessment.

These counts apply to: Truc Quoc Le, Thuy Dang, Leo Le Nguyen, Tien Le

**COUNTS THIRTY-FIVE THROUGH THIRTY-SEVEN:** Title 18, United States Code, Section 2314- Interstate Transportation of Stolen Property.

Defendants: Truc Quoc Le, Thuy Dang, Glenn Lengsavath, Tiffany Vu, Thanh Le, and Tien Le

**FORFEITURE ALLEGATION:** Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code 2461(c) – Forfeiture of Proceeds of Specified Unlawful Activity.

Defendants: Truc Quoc Le, Thuy Dang, Glenn Lengsavath, Tiffany Vu,

**SECOND FORFEITURE ALLEGATION :** Title 18, United States Code, Section 982(a)(1) - Money Laundering Forfeiture.

Defendants: Truc Quoc Le, Thuy Dang, Glenn Lengsavath, Tiffany Vu,

**THIRD FORFEITURE ALLEGATION :** Title 31, United States Code, Section 5317 (c) – Structuring Forfeiture.

Defendants: Truc Quoc Le, Thuy Dang, Glenn Lengsavath, Tiffany Vu,

AO 257 (Rev. 6/78)

**DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT**BY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT  
☐ SUPERSEDING**OFFENSE CHARGED**

SEE PENALTY SHEET ATTACHMENT

**E-FILING**☐ Petty  
☐ Minor  
☐ Misdemeanor  
☒ Felony

PENALTY:

SEE PENALTY SHEET ATTACHMENT

**PROCEEDING**

Name of Complainant Agency, or Person (&amp; Title, if any)

S/A JOHN BARG-SJPD

☐ person is awaiting trial in another Federal or State Court, give name of court☐ this person/proceeding is transferred from another district per (circle one) FRCP 20, 21 or 40. Show District☐ this is a reprosecution of charges previously dismissed which were dismissed on motion of:☐ U.S. Att'y ☐ Defense☐ this prosecution relates to a pending case involving this same defendant☒ prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded underSHOW  
DOCKET NO.MAGISTRATE  
CASE NO.

08-70318 PVT

Name and Office of Person

Furnishing Information on  
THIS FORM JOSEPH P. RUSSONIELLO☒ U.S. Att'y ☐ Other U.S. AgencyName of Asst. U.S. Att'y  
(if assigned)

DAVID R. CALLAWAY

Name of District Court, and/or Judge/Magistrate Location  
NORTHERN DISTRICT OF CALIFORNIA

2008 JUN 18 - U.S. 1:35

MANHARDT, RICHARD

CLERK

U.S. DISTRICT COURT  
NO. DIST. OF CAL. S.J.**JF****CR-08 00401**

DEFENDANT

**HRL****IS NOT IN CUSTODY**1) ☐ Has not been arrested, pending outcome this proceeding.  
If not detained give date any prior summons was served on above charges2) ☐ Is a Fugitive3) ☐ Is on Bail or Release from (show District)**IS IN CUSTODY**4) ☐ On this charge5) ☐ On another conviction6) ☒ Awaiting trial on other charges☐ Fed'l ☒ State

If answer to (6) is "Yes", show name of institution

LOS ANGELES

Has detainer been filed? ☒ Yes ☐ No

If "Yes" give date filed 6/16/2008

DATE OF  
ARREST

Month/Day/Year

5/20/2008

Or... if Arresting Agency &amp; Warrant were not

Month/Day/Year

DATE TRANSFERRED  
TO U.S. CUSTODY☐ This report amends AO 257 previously submitted**ADDITIONAL INFORMATION OR COMMENTS****PROCESS:**☐ SUMMONS ☒ NO PROCESS\*☐ WARRANT Bail Amount: \_\_\_\_\_

If Summons, complete following:

☐ Arraignment ☐ Initial Appearance

Defendant Address: \_\_\_\_\_

\*Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Date/Time: \_\_\_\_\_

Before Judge: \_\_\_\_\_

Comments: \_\_\_\_\_

10.

**ATTACHMENT TO PENALTY SHEET**

**UNITED STATES**

**v.**

**TRUC QUOC LE, THUY DANG, LEO LE NGUYEN,  
GLENN LENGSAVATH, TIFFANY VU, THANH LE, TIEN  
LE, JOHANNA RODRIGUEZ, CARMEN SARMIENTO,  
a/k/a Carmen Gutierrez, MANUAL GUTIERREZ, and JUAN  
ESPINOZA, a/k/a Freddy Navarro.**

**COUNT ONE: Title 18, United States Code, Section 371- Conspiracy to Commit Interstate Transportation of Stolen Property**

**Penalties: 5 years imprisonment;  
\$250,000 fine (or twice the gross gain or gross loss);  
Three years supervised release;  
\$100 special assessment.**

**This Count applies to: ALL DEFENDANTS**

**COUNT TWO: Title 18, United States Code, Section 1956(h) – Conspiracy to Commit Money Laundering.**

**Penalties: 20 years imprisonment;  
\$500,000 fine (or twice the gross gain or gross loss);  
Three years supervised release;  
\$100 special assessment.**

**This Count applies to: Truc Quoc Le, Thuy Dang, Leo Le Nguyen, Glenn Lengsavath, Tiffany Vu**

**COUNTS THREE THROUGH EIGHT: Title 18, United States Code, Section 1957 - Monetary Transactions Using Criminally Derived Property.**

**Penalties: 10 years imprisonment;  
\$250,000 fine (or twice the amount of criminally-derived property);  
Three years supervised release;  
\$100 special assessment.**

**These counts apply to: Thuy Dang, Tiffany Vu, and Glenn Lengsavath**



**COUNTS NINE THROUGH THIRTY-ONE:** Title 31, United States Code, Section 5324(a)(3) – Structuring.

**Penalties:** 10 years imprisonment [enhanced penalty; otherwise 5 years];  
\$500,000 fine (or twice the gross gain or gross loss) [same as  
above; otherwise \$250,000 or double the gross gain/loss];  
Three years supervised release;  
\$100 special assessment.

These counts apply to: Truc Quoc Le, Thuy Dang, Leo Le Nguyen, Glenn Lengsavath, Tiffany Vu

**COUNTS THIRTY-TWO THROUGH THIRTY-FOUR:** Title 18, United States Code, Section 2314- Interstate Transportation of Stolen Property.

**Penalties:** 10 years imprisonment;  
\$250,000 fine (or twice the gross gain or gross loss);  
Three years supervised release;  
\$100 special assessment.

These counts apply to: Truc Quoc Le, Thuy Dang, Leo Le Nguyen, Tien Le

**COUNTS THIRTY-FIVE THROUGH THIRTY-SEVEN:** Title 18, United States Code, Section 2314- Interstate Transportation of Stolen Property.

Defendants: Truc Quoc Le, Thuy Dang, Glenn Lengsavath, Tiffany Vu, Thanh Le, and Tien Le

**FORFEITURE ALLEGATION:** Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code 2461(c) – Forfeiture of Proceeds of Specified Unlawful Activity.

Defendants: Truc Quoc Le, Thuy Dang, Glenn Lengsavath, Tiffany Vu,

**SECOND FORFEITURE ALLEGATION :** Title 18, United States Code, Section 982(a)(1) - Money Laundering Forfeiture.

Defendants: Truc Quoc Le, Thuy Dang, Glenn Lengsavath, Tiffany Vu,

**THIRD FORFEITURE ALLEGATION :** Title 31, United States Code, Section 5317 (c) – Structuring Forfeiture.

Defendants: Truc Quoc Le, Thuy Dang, Glenn Lengsavath, Tiffany Vu,

AO 257 (Rev. 6/78)

## DEFENDANT INFORMATION RELATIVE TO ORIGINAL ACTION - IN U.S. DISTRICT COURT

BY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT  
☐ SUPERSEEDINGName of District Court and/or Judge/Magistrate Location  
NORTHERN DISTRICT OF CALIFORNIA

08 JUN 18 PM 1:37

## OFFENSE CHARGED

SEE PENALTY SHEET ATTACHMENT

☐ Petty  
☐ Minor  
☐ Misdemeanor  
☒ FelonyRICHARD W. WIEKING  
U.S. DISTRICT COURT  
CLERK  
JUAN ESPINOZA, AKA Meddy Navarro  
U.S. DISTRICT COURT  
DISTRICT COURT NUMBER

PENALTY:

SEE PENALTY SHEET ATTACHMENT

E-FILING

CR-08 00401

JF

HRL

## PROCEEDING

Name of Complainant Agency, or Person (&amp; Title, if any)

S/A JOHN BARG-SJPD

☐ person is awaiting trial in another Federal or State Court, give name of court☐ this person/proceeding is transferred from another district per (circle one) FRCrP 20, 21 or 40. Show District☐ this is a reprosecution of charges previously dismissed which were dismissed on motion of:☐ U.S. Att'y ☐ Defense☐ this prosecution relates to a pending case involving this same defendant☒ prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under

SHOW DOCKET NO.

MAGISTRATE CASE NO.

08-70318 PVT

Name and Office of Person  
Furnishing Information on  
THIS FORM

JOSEPH P. RUSSONIELLO

☒ U.S. Att'y ☐ Other U.S. AgencyName of Asst. U.S. Att'y  
(if assigned)

DAVID R. CALLAWAY

## DEFENDANT

## IS NOT IN CUSTODY

- 1) ☐ Has not been arrested, pending outcome this proceeding. If not detained give date any prior summons was served on above charges
- 2) ☐ Is a Fugitive
- 3) ☐ Is on Bail or Release from (show District)

## IS IN CUSTODY

- 4) ☐ On this charge
- 5) ☐ On another conviction
- 6) ☒ Awaiting trial on other charges

☐ Fed'l ☒ State

If answer to (6) is "Yes", show name of institution

LOS ANGELES

Has detainer been filed? ☒ Yes ☐ No

If "Yes" give date filed 6/16/2008

DATE OF ARREST

5/20/2008

Month/Day/Year

Or... if Arresting Agency &amp; Warrant were not

Month/Day/Year

DATE TRANSFERRED TO U.S. CUSTODY

☐ This report amends AO 257 previously submitted

## ADDITIONAL INFORMATION OR COMMENTS

## PROCESS:

☐ SUMMONS ☒ NO PROCESS\*☐ WARRANT

Bail Amount: \_\_\_\_\_

If Summons, complete following:

☐ Arraignment ☐ Initial Appearance

Defendant Address: \_\_\_\_\_

\*Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Date/Time: \_\_\_\_\_

Before Judge: \_\_\_\_\_

Comments: \_\_\_\_\_

11

**ATTACHMENT TO PENALTY SHEET**

**UNITED STATES**

**v.**

**TRUC QUOC LE, THUY DANG, LEO LE NGUYEN,  
GLENN LENGSAVATH, TIFFANY VU, THANH LE, TIEN  
LE, JOHANNA RODRIGUEZ, CARMEN SARMIENTO,  
a/k/a Carmen Gutierrez, MANUAL GUTIERREZ, and JUAN  
ESPINOZA, a/k/a Freddy Navarro.**

**COUNT ONE: Title 18, United States Code, Section 371- Conspiracy to Commit Interstate Transportation of Stolen Property**

**Penalties:     5 years imprisonment;  
                     \$250,000 fine (or twice the gross gain or gross loss);  
                     Three years supervised release;  
                     \$100 special assessment.**

**This Count applies to: ALL DEFENDANTS**

**COUNT TWO: Title 18, United States Code, Section 1956(h) – Conspiracy to Commit Money Laundering.**

**Penalties:     20 years imprisonment;  
                     \$500,000 fine (or twice the gross gain or gross loss);  
                     Three years supervised release;  
                     \$100 special assessment.**

**This Count applies to: Truc Quoc Le, Thuy Dang, Leo Le Nguyen, Glenn Lengsavath, Tiffany Vu**

**COUNTS THREE THROUGH EIGHT: Title 18, United States Code, Section 1957 - Monetary Transactions Using Criminally Derived Property.**

**Penalties:     10 years imprisonment;  
                     \$250,000 fine (or twice the amount of criminally-derived property);  
                     Three years supervised release;  
                     \$100 special assessment.**

**These counts apply to: Thuy Dang, Tiffany Vu, and Glenn Lengsavath**

**COUNTS NINE THROUGH THIRTY-ONE:** Title 31, United States Code, Section 5324(a)(3) – Structuring.

**Penalties:** 10 years imprisonment [enhanced penalty; otherwise 5 years];  
\$500,000 fine (or twice the gross gain or gross loss) [same as above; otherwise \$250,000 or double the gross gain/loss];  
Three years supervised release;  
\$100 special assessment.

These counts apply to: Truc Quoc Le, Thuy Dang, Leo Le Nguyen, Glenn Lengsavath, Tiffany Vu

**COUNTS THIRTY-TWO THROUGH THIRTY-FOUR:** Title 18, United States Code, Section 2314- Interstate Transportation of Stolen Property.

**Penalties:** 10 years imprisonment;  
\$250,000 fine (or twice the gross gain or gross loss);  
Three years supervised release;  
\$100 special assessment.

These counts apply to: Truc Quoc Le, Thuy Dang, Leo Le Nguyen, Tien Le

**COUNTS THIRTY-FIVE THROUGH THIRTY-SEVEN:** Title 18, United States Code, Section 2314- Interstate Transportation of Stolen Property.

**Defendants:** Truc Quoc Le, Thuy Dang, Glenn Lengsavath, Tiffany Vu, Thanh Le, and Tien Le

**FORFEITURE ALLEGATION:** Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code 2461(c) – Forfeiture of Proceeds of Specified Unlawful Activity.

**Defendants:** Truc Quoc Le, Thuy Dang, Glenn Lengsavath, Tiffany Vu,

**SECOND FORFEITURE ALLEGATION :** Title 18, United States Code, Section 982(a)(1) - Money Laundering Forfeiture.

**Defendants:** Truc Quoc Le, Thuy Dang, Glenn Lengsavath, Tiffany Vu,

**THIRD FORFEITURE ALLEGATION :** Title 31, United States Code, Section 5317 (c) – Structuring Forfeiture.

**Defendants:** Truc Quoc Le, Thuy Dang, Glenn Lengsavath, Tiffany Vu,